

Member of the public 1973

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

Dear Sir/Madam

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

A critical review of the Environmental Impact Assessment Report and supporting documentation reveals significant deficiencies. The application lacks an adequate evidential basis for a lawful determination, with essential environmental data absent, baseline information limited and inconsistent, and key aspects of the proposal left undefined. The reliance on a flexible design framework hinders a clear understanding of likely significant effects, and without specified mitigation measures, their effectiveness remains unassessed. 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 evidential support.

Furthermore, the proposal exhibits clear and substantive policy conflicts. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. Such conflicts are directly relevant to the statutory tests needed for consent and compromise the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal raises serious concerns, particularly with large turbines positioned in close proximity to the shoreline, leading to significant implications for landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and unable to support a lawful determination. In light of these factors, the precautionary principle must be invoked.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development raises significant concerns regarding the cultural heritage and community identity associated with the West Lewis coastline. The assessment fails to recognise this area as a dynamic cultural landscape where the environment,

language, tradition, and community interconnect. Instead, it adopts a reductive view that treats heritage merely as a collection of isolated and static assets, neglecting their ongoing social, cultural, and spiritual roles within the community.

A notable shortcoming of the assessment is its treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practices, yet the evaluation categorises them as static features without regard for their continued use and meaning. This mischaracterisation compromises a thorough evaluation of cultural impacts and overlooks their significance within community life.

The assessment also disregards intangible cultural heritage elements, such as the Gaelic language and local traditions, along with the long-standing relationship between the community and the coastal environment. These components are vital to the identity of the area but have been entirely omitted from the assessment, leading to a critical gap in understanding the cultural implications of the development.

Concerns regarding community rights and engagement further complicate the application. The Gaelic-speaking population is recognised as possessing a distinct cultural identity akin to that of Indigenous Peoples; however, the absence of a Free, Prior and Informed Consent process undermines the integrity of the assessment. This lack of meaningful engagement fails to adhere to established principles of participation in decisions impacting cultural and environmental interests.

Moreover, a significant procedural failure is evident in the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The omission of this assessment impedes the competent authority's ability to fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community, thus hindering lawful determination.

From a policy standpoint, the deficiencies in the assessment place the proposal in opposition to the National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect to consider both tangible and intangible heritage, as well as the failure to acknowledge living cultural practices, constitutes a clear deviation from established policy requirements.

In summary, the assessment's inadequacies in addressing living heritage, intangible cultural values, community rights, and statutory obligations result in a substantial evidential gap. The cultural impacts of the development remain inadequately assessed, rendering the application insufficient for evaluating the true cultural cost of the proposal.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies in its assessment of construction and pollution risks, making it impossible to fully evaluate the likely environmental effects. The planned works include extensive seabed preparation and installation activities

within a high-energy Atlantic environment. However, the lack of fully developed Construction Environmental Management Plans or Pollution Prevention Plans raises serious concerns. The application leans on mitigation and contingency measures that are to be defined after consent, which undermines any meaningful assessment of their potential adequacy and effectiveness.

This reliance on undefined future measures is particularly troubling given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to both sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide adequate detail on the methods for prevention, control, or monitoring of these risks.

Moreover, there is significant uncertainty surrounding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without comprehensive modelling and well-defined management strategies, it remains impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also applies to the potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

The lack of comprehensive emergency response procedures further exacerbates these concerns. By postponing contingency planning to a post-consent stage, the application limits the assessment of whether sufficient safeguards are in place to address pollution incidents. This introduces procedural risks and compromises the ability of the competent authority to evaluate environmental protection measures during the determination process.

From a regulatory standpoint, the postponement of essential environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and their mitigations are assessed before consent is granted; failure to provide this information means a lawful determination cannot be reached. Furthermore, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

In summary, the absence of clearly defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts contribute to a materially deficient assessment. These weaknesses hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application lacks a comprehensive assessment of the socio-economic and ecological impacts on fisheries and marine life. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. However, the proposal fails to adequately demonstrate that these vital habitats and uses can be preserved or maintained without causing significant disruption.

A critical concern is the presumption that fishing activities can be relocated without repercussions. The application does not provide sufficient evidence that alternative fishing grounds exist, are accessible, or can sustain the additional fishing pressure. This significant oversight risks contributing to overfishing in other areas and could have broader economic ramifications for the local fishing fleet. The lack of a thorough and evidence-based assessment means that the impacts on fisheries and the livelihoods dependent on them remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, particularly from the underwater noise created during construction activities. The anticipated high-energy hammer piling over an extended duration is expected to disturb marine life over substantial distances, affecting species such as dolphins. The projected disturbance to a large portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these potential effects without adequate supporting evidence.

There exists an evident inconsistency within the application, as it acknowledges the necessity for licences to allow harm to European Protected Species while simultaneously characterising the impacts as negligible. This contradiction calls into question the reliability of the assessment and raises significant concerns regarding compliance with the Habitats Regulations, particularly when potential harm necessitates legal authorisation.

Additionally, the assessment overlooks the 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 the socio-economic landscape.

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 proposed development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, which obstructs any conclusion that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal raises serious concerns regarding carbon balance, as the disturbance of peatland releases stored carbon, potentially creating a carbon debt that undermines the objectives of renewable energy development. There is insufficient information within the application to address this critical issue, nor does it demonstrate that the

overall carbon balance remains beneficial.

Significant risks to sensitive habitats are also apparent, including machair systems and peatland environments that are afforded policy protection. The application fails to show that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, creating a clear evidential gap in relation to biodiversity protection.

The onshore elements consist of cabling across protected moorland, construction of a substation near Stornoway, and the associated access infrastructure traversing sensitive landscapes. These works involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a vital carbon store and ecologically sensitive habitat. The incomplete assessment of these impacts obstructs a full understanding of the project's overall environmental footprint.

Moreover, the routing of 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, leading to questions regarding deliverability and lawful implementation.

The assessment of onshore infrastructure is materially incomplete and does not take into account the full extent of impacts stemming from what constitutes a single integrated project. The offshore turbines and onshore works are intrinsically connected, yet they are examined separately, resulting in a fragmented approach that obscures the true scale of environmental and socio-economic effects.

By excluding or deferring the assessment of onshore impacts, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project are evaluated together; however, the division of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities remain poorly understood.

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

Collectively, the separation of project components, 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, precluding a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are a vital aspect of the area's environmental quality, cultural identity, and tourism appeal.

However, the proposal introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment. This significant alteration is not addressed in the application, which fails to evaluate the impact of such lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the increasing importance of dark skies to the area's identity and to burgeoning sectors like astro-tourism, this omission creates a clear gap in the overall landscape and environmental assessment.

Moreover, there is no consideration of the effects on nocturnal wildlife, which is critical. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, a phenomenon that can lead to disorientation and heightened collision risks. The absence of a lighting impact assessment or a phototaxis study means the application neglects to evaluate how aviation lighting may affect these species or contribute to their mortality rates. Additionally, the ornithological assessment relies solely on daytime survey data, overlooking nocturnal activity and associated dangers. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this danger has not been examined. The lack of site-specific night-time data results in a critical gap in understanding the ecological impacts of the proposal.

Without a thorough assessment of these nocturnal effects, it is impossible to ascertain whether protected species or designated sites could be adversely impacted. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful determination. Furthermore, the failure to address these issues conflicts with National Planning Framework 4 regarding the protection of natural places and environmental quality. It also undermines the overall evaluation of landscape and seascape impacts, as the character of night-time is an integral part of the environment.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application mirrors the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was noted. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application lacks a complete and reliable evidential basis for proper determination.

There are significant gaps in the baseline data provided, reliance on an undefined

design envelope, unspecified mitigation measures, and crucial omissions regarding impact pathways, including those affecting nocturnal wildlife, the full extent of onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of the likely significant effects or residual impacts.

Procedurally, there are notable failures as well. The lack of a compliant Island Communities Impact Assessment violates statutory obligations under the Islands (Scotland) Act 2018, while the incomplete disclosure of the Social Impact Assessment is a substantial omission. These issues prevent the competent authority from adequately evaluating the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, the proposal stands in direct opposition to National Planning Framework 4. It does not demonstrate the necessary protections for biodiversity, natural environments, and cultural heritage, fails to validate acceptable health and wellbeing impacts, and lacks evidence for a net economic benefit due to the absence of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements has been inadequately conducted, obscuring the implications for peatlands, carbon balance, habitats, and crofting land.

The uncertainties surrounding environmental risks are considerable and potentially significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and at times inconsistent. The evidential threshold required to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion that impacts are acceptable.

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

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

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: A29CB1C2

Member of the public 1974

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. This objection arises from a thorough review of the Environmental Impact Assessment Report and supporting documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns have been raised regarding the proposal's compatibility with statutory requirements, national policy, and the principles of sustainable development, particularly given its scale, proximity to the shoreline, and design.

The application lacks an adequate evidential basis for a lawful determination. There is a notable absence of critical environmental data, while baseline information is found to be limited and inconsistent. Furthermore, key aspects of the proposal remain undefined. The application employs a flexible design framework, which obscures a clear understanding of potential significant effects. Additionally, the reliance on unspecified mitigation measures renders their effectiveness impossible to assess. Consequently, the documentation fails to provide a comprehensive or informed understanding of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence.

The proposal presents clear and substantive conflicts with established policies. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests essential for consent and undermine the capability of the competent authority to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal raises considerable concerns regarding landscape capacity, visual dominance, and overall environmental impact due to the large turbines' proximity to the shoreline. Collectively, the lack of sufficient information, dependence on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate, failing to deliver a complete, transparent, and trustworthy account of the likely environmental effects associated with the proposal. The reliance on a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations, creates substantial uncertainty and impedes the consistent application of a worst-case scenario. This weakness undermines the integrity of the assessment, obscuring the true environmental impacts and preventing both the public and the competent authority from grasping the full extent of these effects.

Furthermore, the application significantly depends on mitigation measures, monitoring strategies, and management plans that are yet to be defined. By seeking consent on the premise that environmental harm will be mitigated later, it hinders a thorough evaluation of effectiveness and the assessment of residual impacts. This postponement of critical information to stages after consent is procedurally unacceptable, contradicting the purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigations must be clearly established before determination.

Additionally, there are major evidential shortcomings, such as gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. These deficiencies generate uncertainty regarding the scale and significance of impacts, particularly where claims of negligible or non-significant effects lack robust supporting data. The insufficient information results in an unclear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that does not align with statutory requirements.

Consequently, the application does not meet the evidential threshold established under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also fails to prove compliance with National Planning Framework 4, which includes stipulations regarding biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been thoroughly assessed or that suitable safeguards are established.

In summary, the combination of 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 flaws obstruct a lawful and robust evaluation of environmental effects, leaving the competent authority unable to make a determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species in the West Lewis coastal environment is fundamentally flawed, lacking a complete and reliable understanding of the area's ecological receptors. This marine system is both sensitive and biologically active, yet the methodologies employed do not sufficiently capture the presence, behaviour, or habitat use of key species. Consequently, the assessment fails to provide

a sound evidential basis for evaluating potential impacts.

One significant oversight involves otters, a European Protected Species, which have not been properly recognised or assessed in their use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to an inadequate evaluation of how construction disturbance, noise, and increased activity could affect them. This lack of assessment undermines any assertions regarding the absence of significant effects on this species.

Additionally, the evaluation of basking sharks is inadequate due to an overreliance on aerial surveys, which introduce substantial detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared with established land-based observations that show frequent use of these waters. The disregard for such data results in an incomplete baseline, further weakening the reliability of the assessment's conclusions.

These methodological shortcomings mean that the claims of negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of comprehensive baseline data obstructs a meaningful assessment of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This creates uncertainty about the true scale of risk posed to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant flaws, characterised by gaps in evidence and inconsistencies that call its conclusions into question. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are in decline. However, the application does not sufficiently demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are located in the development area, yet the assessment fails to rigorously evaluate issues such as displacement, collision risk, or habitat loss.

A critical contradiction arises within the application; the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated.

This inconsistency undermines the reliability of the assessment, suggesting that the conclusions drawn lack support from the evidence presented. Furthermore, the assessment does not adequately establish that seabirds associated with protected sites, like the Lewis Peatlands and St Kilda, will be unaffected. It inadequately accounts for the significance of these feeding grounds, and reliance on modelling approaches injects uncertainty, particularly concerning species experiencing severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to understate mortality, especially where baseline data is lacking and behavioural responses are not fully understood.

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

From a regulatory viewpoint, the application fails to meet the evidential threshold needed to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and modelling weaknesses, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, hindering a lawful conclusion in favour of consent. Additionally, the identified deficiencies signify non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally significant seabird populations will not be adversely impacted positions the proposal in direct opposition to national policy.

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological deficiencies, and lack of sufficient evidence. These inadequacies obstruct a thorough evaluation of potential impacts and contribute to the overall assertion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline embodies a living cultural landscape where environment, language, tradition, and community are deeply interconnected. However, the assessment of cultural heritage and community identity is fundamentally inadequate. It adopts a reductive approach, viewing heritage merely as a series of isolated, static assets, without recognising their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice, yet the assessment categorises them merely as static features. This oversight neglects their continued use and meaning, failing to acknowledge the impact of development on their setting. Such mischaracterisation

leads to an incomplete evaluation of cultural effects and disregards the vital role these sites play in community life.

Furthermore, the application overlooks intangible cultural heritage, including the Gaelic language, traditions, and the longstanding relationship between the community and its coastal environment. These elements are central to the area's identity but are entirely absent from the assessment, representing a significant omission. Without factoring in these aspects, the cultural impact of the development cannot be understood.

There are also pressing concerns regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity, recognised as characteristic of Indigenous Peoples, yet no process of Free, Prior and Informed Consent has taken place. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to adhere to established principles of participation in decisions affecting cultural and environmental interests.

Compounding these issues is the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents a lawful determination.

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

In summary, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development have not been adequately assessed, and the application does not offer a sufficient basis for evaluating the true cultural cost of the proposal.

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 application proposes the introduction of large-scale turbines in close proximity to the West Lewis coastline, an area characterised by an open Atlantic horizon, an undeveloped character, and a strong sense of remoteness. This proposal would create a continuous and dominant industrial presence that fundamentally alters the existing character, leading to a permanent and irreversible transformation of the landscape. The assessment provided does not adequately represent the scale of this visual change, which would dominate views from residential areas, historic sites, and popular coastal locations. This would significantly impact visual amenity and diminish the defining qualities of naturalness and remoteness, yet the assessment fails to convey the true level of impact or its significance within such a sensitive landscape.

Concerns arise regarding the methodology used in the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This suggests that the assessment may have understated the magnitude of visual impact, thereby undermining its reliability.

Moreover, the assessment does not properly consider the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape, visually and spatially linked to the Atlantic horizon. Treating these heritage assets as isolated entities fails to acknowledge their interdependence, resulting in an incomplete evaluation of the impacts on their setting and cultural significance. The industrialisation of the seascape would sever these relationships, altering the context in which these heritage assets are experienced and disrupting their connection to the natural horizon. This represents a broader cultural and spatial harm that remains inadequately assessed in the application.

From a policy standpoint, the proposal conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of the proposed changes contradicts the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Additionally, the lack of a robust worst-case assessment further undermines any assertions of policy compliance.

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

Overall, the assessment fails to accurately capture the scale of the impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These significant deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

FISHERIES AND MARINE LIFE

The application raises significant concerns regarding its evaluation of marine life and fisheries, revealing a lack of robust assessment of both ecological and socio-economic impacts. The waters off the West Lewis coast host a vibrant marine ecosystem alongside an active fishing industry, yet there is no evidence provided to assure that these critical habitats and activities can be protected from substantial disruption.

A notable flaw is the assumption that fishing activities can be displaced without repercussions. The application fails to demonstrate the availability or accessibility of alternative fishing grounds that could handle any additional pressures resulting from displacement. This lack of evidence is critical as it opens the door to potential

overfishing in other areas, posing economic risks for the local fishing fleet. The impacts on livelihoods and fisheries remain inadequately understood due to the absence of a clear, evidence-based evaluation.

Moreover, the proposal presents considerable risks to marine species, particularly from construction-related underwater noise. The anticipated high-energy hammer piling over a prolonged duration is likely to create disturbances that reach significant distances, adversely affecting species such as dolphins. The expected impact on a substantial portion of the local bottlenose dolphin population raises serious concerns; yet, the application minimises the significance of these effects, lacking adequate supporting evidence.

Inconsistencies within the application further undermine its credibility. While it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes those impacts as negligible. This contradiction raises alarming questions about compliance with the Habitats Regulations, especially where anticipated harm could necessitate legal authorisation.

The assessment inadequately considers cumulative impacts that arise from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not comply 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 mitigate unacceptable impacts on marine biodiversity, which obstructs any conclusion that the proposal embodies sustainable development.

Overall, the deficiencies related to evidence on fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment incomplete and unreliable. These shortcomings obstruct a thorough evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure linked to the offshore turbines is incomplete and does not fully capture the impacts of what is essentially a single integrated project. The offshore and onshore components are assessed independently, leading to a fragmented analysis that fails to reveal the true scale of the environmental and socio-economic consequences.

The onshore works involve cabling through protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. Notably, excavation is planned in areas of deep peat, particularly in Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, which limits

understanding of the overall environmental footprint of the project.

By not fully considering onshore impacts, the application undermines the assessment of cumulative effects. The Environmental Impact Assessment process mandates that all project components be evaluated together; however, the separation of offshore and onshore elements obscures the combined effects on peatlands, habitats, and local communities.

Moreover, there are considerable risks posed to sensitive habitats, including machair systems and peatland environments that enjoy policy protection. The application does not convincingly demonstrate that impacts on these vital habitats have been comprehensively assessed or that appropriate avoidance measures are in place. This results in a significant gap concerning biodiversity protection.

Concerns also arise around carbon balance due to the disturbance of peatland, which could release stored carbon and potentially create a carbon debt that contradicts renewable energy development goals. The application fails to adequately tackle this critical issue or to show that the overall carbon balance remains favourable.

Furthermore, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not provide sufficient evidence that necessary consents or processes have been initiated, which brings into question the project's deliverability and lawful implementation.

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

In summary, the division of project components, the absence of comprehensive impact assessment, and the insufficient evidence regarding environmental and land use implications render this section of the application both incomplete and unreliable, hindering lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks any assessment of dark skies and nocturnal wildlife, representing a significant omission. 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 proposal includes permanent red aviation lighting that would be visible over long distances, creating a continuous and intrusive "wall of light" across the western horizon, fundamentally altering the night-time environment.

There is no evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. This oversight is particularly troubling considering the importance of dark skies to the region's identity and the

emerging astro-tourism sector. As a result, the failure to assess these impacts leads to a notable gap in the overall landscape and environmental evaluation.

Moreover, the proposal does not examine the effects on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting due to their phototactic responses, which can result in disorientation and a higher risk of collisions. The absence of a lighting impact assessment or a phototaxis study means that there is no understanding of how the proposed aviation lighting may affect these species or lead to increased mortality.

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

Without assessing the nocturnal effects, it is impossible to ascertain whether protected species or designated sites would suffer adverse effects. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, invoking the precautionary principle and preventing a lawful determination.

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

Collectively, the failure to assess dark skies and nocturnal wildlife represents a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis leaves the application incomplete and incapable of sustaining a lawful determination.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed, failing to meet the requirements of sustainable development as assessed against statutory duties, national policy, and evidential standards. It echoes the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a key concern. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short.

There are significant gaps in the evidential basis for the proposal. The use of an undefined design envelope, unspecified mitigation measures, and critical omissions regarding impact pathways—including nocturnal wildlife, complete onshore infrastructure, and tourism effects—render the Environmental Impact Assessment inadequate. This incompleteness prevents a comprehensive understanding of likely

significant effects and residual impacts.

The proposal also suffers from procedural deficiencies, notably the lack of a compliant Island Communities Impact Assessment, which breaches the statutory duties established by the Islands (Scotland) Act 2018. Furthermore, the failure to provide 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, thus deeming the application unfit for determination.

In addition, the proposal conflicts with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural landscapes, and cultural heritage. The application fails to confirm that health and wellbeing impacts are acceptable and lacks tourism impact modelling, preventing it from evidencing a net economic benefit. The assessment of cumulative impacts from both offshore and onshore elements has not been conducted properly, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially severe. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and contain inconsistencies. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, which invokes the precautionary principle and precludes a lawful conclusion regarding the acceptability of impacts.

Moreover, the proposal would lead to significant and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the negative impacts 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 policy conflicts and unresolved environmental risks, obstructs any lawful and evidence-based decision-making. It is essential for the competent authority to either refuse consent on these grounds or to invoke the appropriate regulatory provisions to demand the submission of the necessary missing information.

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

Additional Comments

The Highlands and Islands is systematically being used and abused.... Even the protected flow lands of Caithness is at risk Please stop

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: 46ADC088

Member of the public 1975

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. Concerns arise from a review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies in planning, environmental considerations, cultural impacts, and procedural integrity. 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.

The unprecedented scale of the proposal, with large turbines sited close to the shoreline, raises alarm over landscape capacity, visual impact, and broader environmental implications. The application does not provide a sound evidential basis for a lawful determination, as it lacks critical environmental data, and baseline information is both limited and inconsistent. Additionally, important aspects of the proposal remain undefined. The flexible design framework employed prevents a comprehensive understanding of potential significant effects, while unverified mitigation measures hinder the ability to evaluate their efficacy. Consequently, the supporting documents fail to facilitate a full understanding of the environmental, cultural, and community impacts, rendering claims of negligible or non-significant effects unsupported by solid evidence.

Moreover, the application presents clear conflicts with established policy. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The proposal does not prove that it can meet national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts are directly relevant to the statutory tests required for consent and compromise the competent authority's ability to determine the proposal's acceptability in policy terms.

In light of the lack of adequate information, reliance on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance, it is clear that the application is incomplete and fails to support a lawful determination. Under these circumstances, the precautionary principle must be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is 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 proposed development is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which is home to internationally significant seabird populations that are already in decline. However, the ornithological assessment accompanying the application is fundamentally flawed. It contains significant gaps in evidence and internal inconsistencies that seriously undermine its

conclusions. The assessment fails to sufficiently demonstrate that these vulnerable species will not be adversely affected, particularly in light of the potential for displacement, collision risk, and habitat loss.

Compounding these issues is a fundamental contradiction within the application itself, where the developer asserts that there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions are not adequately supported by the available evidence.

Moreover, the assessment does not provide enough evidence to confirm that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not thoroughly addressed, and the reliance on modelling techniques introduces further uncertainty, especially concerning species in severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate potential mortality, particularly given the inadequacy of baseline data and the incomplete understanding of behavioural responses.

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

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, along with data gaps and limitations in modelling, indicates that the required standard of proof beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle and renders a lawful conclusion in support of consent impossible.

The deficiencies noted also 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 its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These shortcomings impede a thorough evaluation of the potential impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is severely lacking, as it fails to acknowledge the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are interconnected. The application adopts a simplistic viewpoint, perceiving heritage merely as a collection of static, isolated assets without recognising their ongoing social, cultural, and spiritual relevance within the community.

Significant shortcomings are evident in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites serve as active burial places and centres of spiritual practice, yet they are erroneously classified as static features. This oversight neglects their current use, significance, and the potential impact of development on their surroundings. Such mischaracterisation leads to an incomplete assessment of cultural effects, disregarding their importance within community life.

Moreover, the assessment overlooks intangible cultural heritage, including the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are fundamental to the area's identity but are entirely omitted from the evaluation, leading to a substantial gap in understanding the cultural ramifications of the development.

Concerns are further compounded by issues relating to community rights and participation. The Gaelic-speaking population embodies a distinct cultural identity with attributes recognised as characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and fails to adhere to established principles of participation in decisions that impact cultural and environmental interests.

Additionally, a crucial procedural error is the absence of a proper Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to appraise the social, cultural, and economic impacts on the island community. This omission alone obstructs a lawful decision-making process.

From a policy standpoint, these shortcomings place the proposal in direct opposition to National Planning Framework 4, especially regarding the safeguarding of historic assets and locations. The neglect to consider both tangible and intangible heritage, alongside failing to recognise living cultural practices, constitutes a clear deviation from policy stipulations.

In summary, the inadequacies in assessing living heritage, intangible cultural significance, community rights, and statutory requirements culminate in a substantial evidential void. The cultural impacts of the development have not been adequately evaluated, and the application fails to offer a robust foundation for gauging the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the complete Social Impact Assessment fundamentally undermines the ability of the competent authority to conduct a thorough socio-economic and health evaluation. This lack of transparency is a significant procedural omission within the application, failing to fulfil the evidential requirements of the Environmental Impact Assessment regime.

Residents in the vicinity of the proposed development are already experiencing measurable stress, anxiety, and concern stemming from the scale and proximity of the project. These effects are based on direct engagement with the community and are therefore founded in observable reality rather than speculation. However, the absence of the full report inhibits rigorous scrutiny of the findings and constrains the assessment of their implications within the decision-making framework.

There is a clear indication that the proposal poses a threat to community identity and cohesion, with concerns regarding “cultural loss” identified in the developer's preliminary findings. Despite these assertions, the impacts have not been adequately incorporated into the main application nor afforded the necessary importance in the evaluation process. The withholding of the full Social Impact Assessment obfuscates the genuine human and social costs associated with the development.

Furthermore, the assessment of social impacts, health, and wellbeing is materially deficient and lacks the transparency essential for a lawful evaluation. Summaries that are available suggest existing adverse effects that have not been fully articulated, raising questions about the application's alignment with National Planning Framework 4 regarding health and wellbeing. Development proposals must enhance positive health outcomes and mitigate harm, yet the evidence presented indicates ongoing detrimental effects that remain unaddressed.

In sum, the failure to disclose the full Social Impact Assessment, in conjunction with documented adverse impacts, renders the evaluation incomplete and unreliable. This prevents a lawful determination and substantiates the assertion that the application does not possess sufficient supporting information to warrant approval.

FISHERIES AND MARINE LIFE

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

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are important for environmental quality, cultural identity, and tourism. The proposal includes permanent red aviation lighting that would be visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This would significantly change the night-time environment.

The application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Dark skies are crucial to the area's identity and to emerging sectors like astro-tourism. This oversight leads to a notable gap in the landscape and environmental assessment.

Moreover, the application does not evaluate the effects of artificial lighting on nocturnal wildlife. Birds such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to such lighting, which can cause disorientation and

increase collision risks. There is no lighting impact assessment or phototaxis study included, which means the potential effects on these species and their mortality rates are not addressed.

The situation is worsened by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate at night, are similarly at risk of disorientation from artificial lighting, yet this has also not been assessed. The lack of specific night-time data leads to a significant understanding gap regarding ecological impacts.

Without proper assessment of nocturnal effects, it is impossible to determine if protected species or designated sites would be adversely affected. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt is not met, thus engaging the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4, which aims to protect natural places and ensure environmental quality. It also weakens the overall evaluation of landscape and seascape impacts, as the night-time character is a vital component of the environment.

In summary, the failure to assess dark skies and nocturnal wildlife presents a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis means that the application is incomplete and cannot support a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the standards of sustainable development when evaluated against national policy, statutory obligations, and evidential requirements. Notably, this application brings forth the same principal issues that led to the rejection of the Lewis Wind Power proposal in 2008, which highlighted an unacceptable level of industrialisation. Although presented under an enhanced policy framework that prioritises biodiversity, peatland conservation, landscape integrity, and community wellbeing, the application remains fundamentally flawed.

A significant concern is the lack of a complete and reliable evidential basis for determination. Critical gaps exist in baseline data, and there is continued reliance on an undefined design envelope alongside unspecified mitigation measures. Key impact pathways are omitted, including those related to nocturnal wildlife, the full extent of onshore infrastructure, and effects on tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedurally, there are marked deficiencies. The absence of a compliant Island Communities Impact Assessment is a breach of statutory duty as outlined in the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social

Impact Assessment constitutes a material omission, impeding the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. Such oversights render the application unfit for determination.

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

Environmental risks associated with this proposal are uncertain and potentially significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies. The evidential threshold needed to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion that the impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive deficiencies in information, alongside conflicts with policy and unresolved environmental risks, hinder a lawful and evidence-based decision. The competent authority is urged to refuse consent based on these grounds or to invoke the relevant regulatory provisions to compel the submission of the necessary information. Therefore, a formal request is made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

Additional Comments

I am objecting to the proposed Spiorad Offshore Wind Farm because I believe it will have a significant and lasting negative impact on the place I live, the environment around us, and the quality of life of the local community. The place that I call home. Living in the Outer Hebrides is unlike living anywhere else. People do not come here for industrial development or heavily commercialised coastlines, they visit because of the unspoilt landscapes, open sea views, wildlife, peace and dark skies that make these islands so unique. These are not small features by any means, they are part of our identity, our wellbeing and our local economy.

The scale of this proposal is deeply concerning. Huge offshore turbines, associated infrastructure, increased marine disruption and the industrialisation of our surrounding waters would permanently alter the character of the area. What is being proposed cannot simply be blended into the environment here. Once these landscapes and seascapes are changed, they cannot truly be restored, ever.

I am also extremely concerned about the potential impact on marine life and local ecosystems. The waters around the Hebrides are home to important protected wildlife including seabirds, whales, dolphins, porpoises, fish populations and sensitive marine habitats. There is still uncertainty around the long term cumulative effects of large scale offshore wind developments, underwater noise, construction disturbance, vessel traffic and inevitable habitat disruption. I do not believe enough weight is being given to the environmental risks in such a fragile and internationally important coastal environment.

Another concern I have is about the impact this development could have on seabird populations. The Outer Hebrides are internationally recognised for their birdlife, with many protected and vulnerable species relying on these waters and coastlines for feeding, migration and breeding. Large offshore wind farms present risks through collision with turbine blades, disruption to migratory routes, displacement from feeding grounds and disturbance during both construction and operation. Species such as gannets, puffins, kittiwakes, fulmars, guillemots and other seabirds are already facing pressures from climate change and changing marine conditions. Introducing industrial scale infrastructure into these habitats will place additional strain on populations that are already vulnerable.

In addition, dark skies and natural horizons are a huge part of island life. The visual impact of large turbines and associated lighting would fundamentally change the feeling of this place, both for residents and visitors. Many of us live here because of the connection to nature, peace and remoteness. Developments of this scale risk eroding exactly what makes these islands special.

There is also growing concern within the community that local people are expected to carry the visual and environmental burden of major energy infrastructure while seeing very little meaningful long term benefit themselves. Decisions like this should not overlook the voices of the communities who actually live here year round and will experience the direct consequences every day.

I fully understand the importance of renewable energy and the need to move towards more sustainable solutions. However, that should not mean sacrificing environmentally sensitive, culturally significant and valued landscapes and marine areas without fully considering the long term consequences.

For these reasons, I strongly object to the Spiorad na Mara Offshore Wind Farm proposal.

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: 352355DC

Member of the public 1976

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

Dear Sir/Madam

This letter formally objects to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under marine licensing and Environmental Impact Assessment regimes. The review of the Environmental Impact Assessment Report and its supporting documentation has revealed material deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The development site, located off the west side of the Isle of Lewis, is characterised by an Atlantic-facing coastline, a near-pristine environment, and a rich cultural identity. The scale and proximity of the proposed turbines, along with the design, raise serious concerns about compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application does not provide a robust evidential basis for a lawful determination. Key environmental data is absent, baseline information is inadequate and inconsistent, and essential elements of the proposal remain undefined. The flexible design framework employed limits the understanding of likely significant effects, and the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the documentation fails to offer a full or informed understanding of the potential environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects, which lack solid evidence.

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate and fails to deliver a comprehensive, transparent, or trustworthy evaluation of the probable environmental repercussions of the proposal. By employing a flexible Project Design Envelope without any firm commitment to particular turbine dimensions, layouts, or configurations, significant uncertainty is introduced. This ambiguity undermines the integrity of the assessment and means that the impacts outlined may not accurately represent the development that is ultimately constructed. Consequently, both the public and the competent authority are deprived of a clear understanding of the true extent of environmental effects.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. As a result, consent is being sought on the premise that environmental harm will be addressed after approval, which obstructs any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of crucial information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be thoroughly established before determination.

Moreover, there exist significant evidential deficiencies, such as gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, especially when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not satisfy the evidential threshold necessary under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, including stipulations concerning biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been fully assessed or that appropriate safeguards are in place.

In conclusion, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and thorough assessment of environmental effects and mean that the competent authority lacks the necessary information to make a determination regarding the application.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate, failing to provide a thorough or dependable understanding of ecological receptors in the West

Lewis coastal environment. This marine system is highly sensitive and biologically active, yet the baseline data is incomplete. The methodologies employed do not sufficiently capture species presence, behaviour, and habitat use, resulting in a lack of a solid evidential foundation for evaluating impacts.

A significant shortfall in the assessment concerns otters, which are a European Protected Species. The application does not adequately acknowledge or assess their active use of coastal areas for foraging and movement. Consequently, the lack of evaluation regarding their core foraging range and behavioural patterns means that the potential effects of construction disturbance, noise, and increased activity have not been thoroughly assessed. This gap undermines any conclusions drawn about the absence of significant effects on this species.

Moreover, the assessment of basking sharks is flawed due to the reliance on aerial surveys, which introduce considerable detection bias, especially in Atlantic conditions. This methodology is likely to underestimate their presence when compared to established land-based observations that indicate frequent usage of these waters. The failure to properly incorporate or consider such data results in an incomplete baseline, diminishing the reliability of the conclusions reached.

These methodological flaws lead to assertions of negligible or non-significant effects based on assumptions rather than solid evidence. The lack of sufficient baseline data also hampers meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty clouds the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to 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. 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 issues hinder a robust evaluation of impacts on marine ecology and protected species and contribute to the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application for the proposed development is fundamentally flawed, as the ornithological assessment reveals significant gaps in evidence and internal contradictions that undermine its conclusions. Situated within key foraging areas and migratory pathways, the development threatens internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline. However, the application fails to convincingly demonstrate that these species will not be adversely affected.

A notable contradiction arises within the application, where the developer asserts there are no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary when substantial harm is anticipated. This inconsistency casts doubt on the reliability of the assessment, suggesting that its conclusions lack support from the underlying evidence. Moreover, the assessment does not sufficiently prove that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds has not been adequately recognised, and the reliance on modelling approaches introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially given incomplete baseline data and a lack of understanding of behavioural responses.

Additionally, the proposed siting of turbines within a recognised migratory corridor poses a further significant risk. It effectively creates a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The assessment fails to properly consider the long-term consequences of sustained mortality in this corridor or the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold needed to ascertain no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and modelling inadequacies, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and prevents a lawful conclusion in favour of consent.

Moreover, these deficiencies 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 places the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal's assessment of cultural heritage and community identity is fundamentally flawed. It fails to acknowledge the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. Instead, the application adopts a simplistic view, treating heritage as a collection of separate, unchanging assets rather than recognising their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of significant cultural sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are not merely static

features; they are active places of burial and spiritual practice. The assessment overlooks their continued use and meaning, failing to appreciate how the proposed development would affect their surroundings. This mischaracterisation leads to an incomplete understanding of cultural impacts and neglects their importance to community life.

Moreover, the application does not adequately consider intangible cultural heritage, including the Gaelic language and local traditions, nor does it reflect the enduring relationship between the community and the coastal environment. These factors are essential to the area's identity, yet they are entirely excluded from the assessment, representing a critical oversight. Without addressing these elements, the true cultural impact of the development remains obscured.

There are also significant issues regarding community rights and engagement. The Gaelic-speaking population, which possesses a unique cultural identity akin to that of Indigenous Peoples, has not been consulted through a process of Free, Prior and Informed Consent. This lack of genuine engagement undermines the assessment's validity and does not align with recognised principles of participation in matters affecting cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment is a severe procedural shortcoming, as mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot adequately fulfil its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission is critical and prevents a lawful determination.

From a policy standpoint, these deficiencies place the proposal at odds with the National Planning Framework 4, especially regarding the safeguarding of historic assets and places. The neglect to consider both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, constitutes a clear divergence from policy requirements.

In summary, the failure to 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 sufficiently evaluated, and the application lacks a solid foundation for determining the actual cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full Social Impact Assessment has not been published, leading to a significant evidential gap that hampers both public understanding and the competent authority's ability to evaluate the associated social risks comprehensively. Although the developer has undertaken a Social Impact Assessment that included focus groups with local residents, the non-disclosure of the complete report raises concerns regarding transparency and thoroughness in the evaluation process. Summaries reveal that residents are facing measurable stress, anxiety, and concern due to the proximity and scale of the proposed development, underscoring the need for a detailed examination

of these impacts, which are based on direct engagement rather than speculation.

Moreover, the proposal is viewed as a threat to community identity and cohesion, with the developer acknowledging potential “cultural loss” in their findings. However, these significant impacts have not been adequately incorporated into the main application or weighted appropriately. The withholding of the full assessment obscures the true social and human costs associated with the development, thereby undermining the overall Environmental Impact Assessment process.

A comprehensive understanding of social, economic, and health impacts is imperative for developments of this magnitude, particularly when community character is at stake. The failure to disclose the complete dataset inhibits a balanced assessment of benefits and harm, rendering the application deficient. From a policy standpoint, the application does not align with National Planning Framework 4 regarding health and wellbeing, which necessitates that development fosters positive health outcomes and mitigates harm. Existing evidence indicates adverse effects that have not been fully disclosed, further complicating compliance with this policy.

The procedural ramifications of this situation are substantial. Without the complete Social Impact Assessment, the competent authority cannot conduct a thorough socio-economic and health evaluation, constituting a material omission within the application. This failure to meet the evidential requirements of the Environmental Impact Assessment framework is critical. Collectively, the non-disclosure of the full assessment, alongside evidence of existing adverse impacts, results in an incomplete and unreliable evaluation, obstructing a lawful determination and reinforcing the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed application entails the introduction of large-scale turbines in close proximity to the West Lewis coastline, which is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. This development would result in a continuous and dominant industrial presence that fundamentally alters the area's character, leading to a permanent and irreversible transformation of the landscape.

The assessment of the visual impacts is severely lacking, failing to convey the extent of the changes expected. The scale and proximity of these turbines mean they would dominate views from residential areas, historic sites, and popular coastal locations, thereby directly impacting visual amenity and diminishing the defining qualities of naturalness and remoteness. There is a failure to properly assess the significance of this impact within such a sensitive environment.

Methodological issues have also been identified concerning the selection and presentation of visual viewpoints. Evidence suggests these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This

limitation raises the possibility that the magnitude of visual impact has been understated, which undermines the reliability of the overall assessment.

Additionally, the assessment neglects to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Prominent sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape setting, which is visually and spatially connected to the Atlantic horizon. The failure to recognise their interdependence results in an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape threatens to sever these vital relationships, altering how heritage assets are experienced and disrupting their connection to the natural horizon. This is not solely a visual concern but encompasses broader cultural and spatial harm that the application has not adequately addressed.

From a policy perspective, the proposal is at odds with National Planning Framework 4 regarding the protection of natural places and historic assets. The extent of the proposed changes is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further erodes any assertion of policy compliance.

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

Collectively, the assessment does not accurately portray the scale of impact, the environment's sensitivity, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal conflicts with the imperative to protect this landscape.

CONSTRUCTION AND POLLUTION RISKS

The absence of detailed management plans, along with undefined mitigation measures, renders the assessment of construction and pollution risks materially deficient. The proposal involves significant seabed preparation and installation activities within a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on future mitigation and contingency measures to be formulated post-consent, which hinders any meaningful evaluation of their adequacy or effectiveness.

This reliance on unspecified future actions is particularly concerning given the sensitivity of the receiving environment. The West Lewis coastline, known for its clean coastal waters and important habitats, is vulnerable to sediment disturbance and contamination. While the application acknowledges risks such as sediment

mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on preventative, control, or monitoring measures for these risks.

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

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application obstructs the evaluation of whether suitable safeguards are established to address pollution incidents. This not only introduces procedural risk but also undermines the ability of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and proposed mitigation measures must be assessed prior to consent; the absence of such information precludes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the deficiencies noted in the application—the lack of defined mitigation measures, insufficient detail in management plans, and uncertainty surrounding potential impacts—strongly indicate that a robust evaluation of construction and pollution risks is not feasible, leading to the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The 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.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The offshore turbines and onshore works are interconnected, yet the assessment treats them separately. This fragmented approach fails to capture the overall environmental and socio-economic effects of what is a single integrated project.

Onshore elements involve cabling across protected moorland, the construction of a substation near Stornoway, and the creation of access infrastructure through sensitive landscapes. These activities entail excavation across areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The application does not adequately assess these impacts, limiting the understanding of the project's total environmental footprint.

By excluding or postponing the assessment of onshore impacts, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered together, yet the separation leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

There are notable risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application fails to show that these impacts have been thoroughly assessed or that suitable avoidance measures have been implemented. This creates a significant evidential gap regarding biodiversity protection.

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

Furthermore, routing infrastructure through active croft land may conflict with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, prompting questions about deliverability and lawful execution.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which contribute significantly to environmental quality, cultural identity, and the tourism value of the area. However, the Environmental Impact Assessment fails to include any consideration of dark skies and nocturnal wildlife, representing a critical omission. The proposal introduces permanent red aviation lighting that would be visible over long distances, creating a continuous and intrusive "wall of light" across the western horizon, fundamentally altering the night-time environment.

The application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of assessment is particularly concerning given the importance of dark skies to the region's identity and the growth of tourism sectors such as astro-tourism. The absence of an analysis of these effects creates a significant gap in the overall landscape and environmental assessment.

Moreover, there is no assessment of how this lighting may affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototactic behaviours, which

can lead to disorientation and increased risks of collision. The application does not include a lighting impact assessment or a phototaxis study, neglecting to examine the potential consequences for these species or the potential increase in mortality rates.

This deficiency is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activities and related risks. Other species, including Kittiwakes, may forage or migrate at night and are similarly vulnerable to disorientation from artificial lighting, yet this risk has not been examined. The lack of site-specific night-time data leaves a critical gap in the understanding of ecological impacts.

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

From a policy standpoint, this omission is contrary to National Planning Framework 4 regarding the protection of natural places and environmental quality. It also undermines the comprehensive assessment of landscape and seascape impacts, as the night-time character is integral to the environment. Overall, the absence of any assessment of dark skies and nocturnal wildlife presents a substantial 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 proposed development raises serious concerns regarding its impact on the tourism sector, which is a crucial component of the Isle of Lewis economy. The island's appeal is rooted in its wild coastline, nearly untouched landscapes, dark skies, and a profound sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantitative assessment of how large-scale offshore infrastructure may influence visitor numbers, their behaviour, or the overall economic contribution of tourism.

Tourism has experienced notable growth, with its value rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the local economy. However, the application does not consider how the industrialisation of the seascape and the potential decline in environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the island. Without this critical analysis, it is impossible to ascertain whether the development would yield a net economic benefit or jeopardise a vital and expanding sector.

Additionally, the assessment neglects to recognise the significance of environmental quality in attracting tourists, particularly the value of unspoiled landscapes and dark skies to enhancing visitor experiences and tapping into emerging markets like nature-

based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, resulting in a substantial void in understanding the potential impacts on this important aspect of the local economy.

Given the limited economic diversification typical of an island community, the failure to evaluate tourism impacts carries broader ramifications for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment suggests that the economic vulnerabilities present have not been adequately analysed, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly concerning economic impact and the necessity of evidencing net benefits. It contradicts strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to assess the economic ramifications of the proposal.

In summary, the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and acknowledge the economic dependency of the island culminates in a significant evidential gap. This deficiency hinders a thorough evaluation of economic effects and leads to the conclusion that the application is fundamentally incomplete.

SUMMARY

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

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

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

Furthermore, the proposal contradicts the National Planning Framework 4, failing to

demonstrate biodiversity protection, acceptable health and wellbeing impacts, or net economic benefits, as there is no tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements has not been adequately conducted, leaving unclear effects on peatlands, carbon balance, habitats, and crofting land.

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

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

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

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

Additional Comments

I am 100 opposed to the industrialisation of the Isle of Lewis and ~~100~~ opposed to N4 and the destruction it will cause. This proposal contravenes many of NPF4 and should be declined. The damage will be extensive and irreversible and will Cause population decline. Please record my opposition to this horrific proposal.

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: 7057BFA6

Member of the public 1977

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary transparency and reliability, failing to fully account for the potential environmental effects of the proposal. The flexible Project Design Envelope approach, which does not commit to specific turbine dimensions, layouts, or configurations, introduces a substantial level of uncertainty. This uncertainty hampers the ability to apply a worst-case scenario consistently, ultimately undermining the integrity of the assessment. Consequently, the information provided may not accurately represent the impacts of the eventual construction, leaving both the public and competent authority without a clear understanding of the actual environmental consequences.

Moreover, the application is overly reliant on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under these conditions means that environmental harm is expected to be addressed later, making it impossible to meaningfully evaluate the effectiveness of these measures or to assess residual impacts. This postponement of crucial information to post-consent phases is procedurally unacceptable and runs counter to the objectives of the Environmental Impact Assessment process, which necessitates that significant effects and mitigation strategies are clearly defined before any determination can occur.

There are also considerable evidential shortcomings, characterised by gaps in baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. Such deficiencies create uncertainty regarding the magnitude and significance of impacts, especially in cases where claims of negligible or non-significant effects are made without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainties that are incompatible with statutory obligations.

Ultimately, the application does not satisfy the evidential standards set forth by the Habitats Regulations, which require the exclusion of adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate alignment with the National Planning Framework 4, particularly in relation to the protection of biodiversity and environmental integrity, as it has not been shown that impacts have been fully assessed or that adequate 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 hinder a lawful and thorough assessment of environmental effects, leaving the competent authority without the necessary information to make an informed decision regarding the application.

ASSESSMENT OF ALTERNATIVES

The application fails to adequately assess alternatives, which does not satisfy 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, it merely outlines the project's development history. This lack of analysis does not show that less harmful options have been properly identified and assessed in preference to more damaging solutions.

There is no clear or evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has given serious consideration to placing turbines further offshore, where visual, ecological, and coastal impacts would probably be lessened. The sensitivity of the West Lewis coastline makes proximity to shore crucial in assessing impact. The lack of such analysis means that it cannot be concluded that the proposed siting is the least damaging option.

This inadequacy also applies to cable routing and landfall assessment. There is insufficient evidence that alternative routes have been thoroughly examined to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The absence of a clear strategy to avoid such impacts, along with the lack of comparative analysis, suggests that design-based mitigation has not been implemented, leading instead to reliance on post-design mitigation measures.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species is fundamentally flawed, failing to deliver a comprehensive and trustworthy understanding of the ecological receptors in the West Lewis coastal environment. This area is a highly sensitive and biologically rich marine system, yet the baseline data provided is insufficient. The methodologies employed do not effectively capture vital details about species presence, behaviour, and habitat usage, leading to an unreliable evidential basis for assessing potential impacts.

One critical oversight involves otters, classified as a European Protected Species. The application does not adequately recognise or evaluate their active use of coastal

regions for foraging and movement. Without consideration of their core foraging range and behavioural habits, the potential consequences of construction disturbances, noise, and increased activity remain inadequately assessed. This significant gap undermines the conclusions drawn about the absence of substantial effects on this species.

Additionally, the assessment of basking sharks is marred by its reliance on aerial surveys, which introduce a notable detection bias, especially under Atlantic conditions. This method is likely to underestimate the presence of these sharks, particularly when compared to established land-based observations that indicate their frequent use of the waters. The neglect to incorporate or properly evaluate such information results in an incomplete baseline, thus diminishing the reliability of the conclusions reached.

The limitations inherent in these methodologies mean that the assertions of negligible or non-significant effects stem from assumptions rather than solid evidence. The lack of adequate baseline data obstructs meaningful evaluations of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the actual level of risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not satisfy the requirements set by the Environmental Impact Assessment regime and the National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced by these deficiencies hinders the ability to eliminate adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Given these circumstances, granting consent cannot be justified.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application for the development is flawed, presenting significant gaps in evidence and inconsistencies that undermine its findings. It is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which hosts internationally important seabird populations that are already in decline. However, the application fails to sufficiently demonstrate that these species will not face adverse effects. There is a critical lack of evaluation regarding the implications of displacement, collision risk, or habitat loss related to the proposed development.

A notable contradiction is present in the application, where the developer asserts there will be no significant adverse effects while also making a case for Habitats Regulations derogation, which is typically only necessary when significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment and suggests that its conclusions do not align with the available evidence. Furthermore, the

assessment does not adequately ensure that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The reliance on modelling approaches introduces a level of uncertainty, particularly for species like Kittiwakes and Fulmars, which are experiencing severe population declines. This may result in an underestimation of mortality rates due to incomplete baseline data and an insufficient understanding of behavioural responses.

The proposed siting of turbines within a recognised migratory corridor adds another layer of significant risk, potentially acting as a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The assessment does not thoroughly investigate the long-term effects of sustained mortality within this corridor, nor does it consider the implications for species that have relatively small global populations.

From a regulatory standpoint, the application fails to meet the evidential standard 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 the modelling, indicates that the requisite standard of beyond reasonable scientific doubt has not been achieved. This necessitates the application of the precautionary principle, thereby obstructing a lawful conclusion that would support consent. Additionally, the identified deficiencies represent a breach of the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected puts the proposal in direct opposition to national policy.

In summary, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These issues hinder a thorough evaluation of impacts and collectively suggest that the application does not fulfil the statutory requirements essential for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage assessment associated with this application is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. The proposal adopts a narrow perspective by treating heritage as isolated and static, ignoring the ongoing social, cultural, and spiritual roles these elements play within the community.

Particularly concerning is the inadequate treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual significance, yet are mischaracterised as static features. This oversight neglects their continued use and the implications of development on their context, leading to an incomplete cultural evaluation that dismisses their integral role in community life.

Moreover, the assessment overlooks intangible cultural heritage, such as the Gaelic

language and local traditions, as well as the enduring relationship between the community and the coastal environment. These components are central to the area's identity, and their omission signifies a critical gap in the evaluation process. Without considering these aspects, the potential cultural impact of the development remains inadequately understood.

There are also pressing concerns regarding community rights and engagement. The Gaelic-speaking population, which embodies distinct characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the credibility of the assessment and fails to adhere to recognised principles of participation in matters affecting cultural and environmental interests.

Additionally, the application is deficient in not providing a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. This absence means that the competent authority is unable to fulfil its legal obligation to assess the social, cultural, and economic impacts on the island community, thereby precluding a lawful determination.

From a policy standpoint, these oversights position the proposal in direct opposition to National Planning Framework 4, particularly regarding the preservation of historic assets and places. The neglect of both tangible and intangible heritage, alongside the failure to recognise living cultural practices, clearly deviates from established policy standards.

In summary, the lack of assessment concerning living heritage, intangible cultural values, community rights, and compliance with statutory obligations culminates in a significant evidential gap. The cultural impacts of this development have not been adequately evaluated, and the application does not present a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The analysis of social impacts, health, and wellbeing associated with the proposal is fundamentally flawed and lacks the requisite transparency for a lawful assessment. Although the developer commissioned a Social Impact Assessment that included engagement with local residents through focus groups, the full report remains unpublished. This lack of disclosure creates a significant evidential gap, hindering both public understanding and the competent authority's ability to evaluate the social risks highlighted by the developer's own research.

Summaries that are available reveal that local residents are currently facing notable levels of stress, anxiety, and concern linked to the proposal's scale and proximity. These effects stem from direct interactions and are therefore based on concrete evidence rather than speculation. The failure to make the complete assessment available undermines rigorous scrutiny of these findings and restricts the capacity to assess their relevance in the decision-making process.

Moreover, there is a notable perception that the proposal poses a direct threat to community identity and cohesion, with the developer's own findings acknowledging a potential "cultural loss." Despite this, such impacts have not been sufficiently integrated into the main application nor afforded the appropriate consideration. The absence of the complete Social Impact Assessment thus conceals the actual human and social costs of the proposed development.

This lack of transparency has serious implications for the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for projects of this magnitude, especially when community character and functionality are at risk. By withholding the complete dataset, the application fails to establish a comprehensive evidential foundation necessary for assessing the balance between benefits and detriments.

From a policy standpoint, the application does not illustrate adherence to the National Planning Framework 4 regarding health and wellbeing. Development should facilitate positive health outcomes and mitigate harm; however, the evidence at hand suggests there are existing adverse effects that remain undisclosed. Without access to the full assessment, the demonstration of compliance with this policy is unattainable.

The procedural ramifications of this situation are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a significant omission within the application and a failure to satisfy the evidential obligations of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of pre-existing adverse impacts, results in an incomplete and unreliable assessment. This inadequacy precludes a lawful determination and reinforces the position that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the potential impacts on seascape, landscape, and visual elements is significantly lacking and does not adequately reflect the extent of change or the sensitivity of the surrounding environment. The character of the West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a pronounced sense of remoteness. The proposed installation of large-scale turbines near the shoreline would introduce a continuous industrial presence that fundamentally alters this character, resulting in a permanent and irreversible transformation of the landscape.

The application fails to adequately capture the magnitude of visual change expected from the project. Given their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would directly impact visual amenity and diminish the essential qualities of naturalness

and remoteness. The assessment inadequately conveys the level of this impact and its significance within such a sensitive landscape.

Methodological concerns arise regarding the selection and presentation of visual viewpoints in the assessment. There is evidence to suggest that the chosen viewpoints do not fully capture the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been understated, thus undermining the reliability of the assessment.

Furthermore, the assessment neglects to consider the interconnected relationship between the landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape context that connects them visually and spatially to the Atlantic horizon. The assessment treats these heritage assets as isolated, failing to recognise their interdependence, which results in an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering how heritage assets are experienced and their relationship with the natural horizon. This represents not just a visual impact but a broader cultural and spatial harm that has not been adequately considered in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4 concerning the protection of natural areas and historic assets. The extent of the proposed changes is incompatible 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 calls into question any claims of compliance with policy.

It is also evident that the impacts cannot be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be a dominant and unavoidable feature. The resulting changes are therefore fundamental and permanent, incapable of being 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 reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application lacks a comprehensive assessment of construction and pollution risks, failing to provide the necessary detail for evaluating potential environmental effects. Given the high-energy Atlantic environment, substantial seabed preparation and installation works are proposed, yet there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the

application relies on mitigation and contingency measures that would only be prepared after consent, hindering any meaningful assessment of their adequacy or effectiveness.

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

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

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

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigation measures must be evaluated prior to consent, and the lack of such information renders a lawful determination impossible. Furthermore, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

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

A critical shortcoming lies in the presumption that fishing activities can be displaced

without repercussions. The application fails to substantiate claims that there are alternative fishing grounds available, accessible, and able to accommodate any additional pressure. This lack of evidence is crucial, as displacement of fishing efforts could lead to overfishing in other areas and create broader economic ramifications for the local fishing fleet. Consequently, without a well-supported assessment, the potential impacts on fisheries and the livelihoods dependent upon them remain inadequately understood.

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

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

Additionally, there are considerable risks posed to sensitive habitats such as machair systems and peatland environments, which are protected under policy. The application does not demonstrate that these habitat impacts have been fully evaluated or that suitable avoidance measures have been put in place, resulting in a significant evidential gap concerning biodiversity protection.

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of any assessment regarding dark skies and nocturnal wildlife is a glaring omission within the Environmental Impact Assessment. The West Lewis coastline boasts exceptionally dark skies, which are vital not only for environmental quality but also for cultural identity and tourism. The proposed installation of permanent red aviation lighting would create a continuous and intrusive "wall of light" effect across the

western horizon, fundamentally altering the night-time environment.

Moreover, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly significant given the increasing importance of dark skies to the area's identity and the growth of tourism sectors such as astro-tourism. Such a failure creates a substantial gap in the overall landscape and environmental evaluation.

Equally concerning is the lack of assessment regarding the impacts on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting, which can cause disorientation and increase the risk of collision. The absence of any lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species, including potential increases in mortality, have not been considered.

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

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

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

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

TOURISM

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

behaviour, or overall economic contribution.

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

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

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the essential criteria of sustainable development as outlined by statutory duties, national policy, and evidential standards. It mirrors the principal issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. This current application is presented under a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still falls short.

The evidential basis for the application is incomplete and unreliable. There are significant gaps in the baseline data, an undefined design envelope is used, and there is

a reliance on unspecified mitigation measures. Moreover, key impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and effects on tourism are omitted. Consequently, the Environmental Impact Assessment is insufficient, failing to provide a clear understanding of likely significant effects or residual impacts.

Procedural issues are evident as well. The lack of a compliant Island Communities Impact Assessment breaches the statutory duty under the Islands (Scotland) Act 2018, and the failure to fully disclose the 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.

Additionally, the proposal conflicts with the National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural places, or cultural heritage. It fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of offshore and onshore components have not been assessed appropriately, which clouds the understanding of 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 at times inconsistent. The required evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been met, activating the precautionary principle and precluding any lawful conclusion about the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The magnitude of information deficiencies, alongside policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. Therefore, the competent authority should either deny consent based on these grounds or invoke relevant regulatory provisions to obtain the missing information.

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

Additional Comments

I strongly believe that these structures are extremely dangerous and damaging to the ecosystem and environment for both humans and wildlife including marine creature both in the construction and operation especially with regard to infrasound on land and under water.

Tourism to these beautiful and irreplaceable communities and countryside will be severely impacted.

Livelihoods and lives of residents will be devastated.

There is no joined up energy plan. This is profiteering on a grand scale and does not place any value on the destruction and desecration of our land.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 1651FF6E

Member of the public 1978

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a detailed review of the Environmental Impact Assessment Report and associated documentation, revealing several critical deficiencies related to planning, environmental considerations, cultural heritage, and procedural integrity. The site is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and significant cultural identity. The scope, design, and scale of the proposed development give rise to serious concerns regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application is fundamentally flawed due to the absence of a robust evidential basis necessary for a lawful determination. Essential environmental data is lacking, while the baseline information provided is both limited and inconsistent, leaving key elements of the proposal undefined. The employment of a flexible design framework hampers a clear assessment of likely significant effects, and the reliance on unspecified mitigation measures precludes any evaluation of their effectiveness. Consequently, the documentation does not furnish a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsubstantiated by adequate evidence.

Moreover, there exist clear and substantive conflicts with existing policies. The proposal shows inconsistencies with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. These policy conflicts directly relate to the statutory tests required for consent and compromise the competent authority's ability to deem the development acceptable from a policy perspective.

In addition, the unprecedented scale of the proposal poses significant challenges, with large turbines located in close proximity to the shoreline, which raises profound concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation measures, evidential shortcomings, and pronounced non-compliance with policy clearly indicate that the application is incomplete and insufficient to support a lawful determination. Under these circumstances, it is imperative that the precautionary principle be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species presents significant deficiencies that compromise the understanding of ecological receptors within the West Lewis coastal environment. This area is known for its sensitivity and biological activity. 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 fails to establish a reliable evidential basis for evaluating potential impacts.

A notable gap in the assessment concerns 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 the potential impacts from construction activities, noise, and increased human presence. Such inadequacies undermine the conclusions drawn about the absence of significant effects on this species.

Further shortcomings are evident in the assessment of basking sharks, where the reliance on aerial surveys introduces a considerable detection bias, particularly in the Atlantic's unique conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that reveal frequent usage of these waters. The failure to incorporate or appropriately consider such data results in an incomplete baseline, which in turn undermines the reliability of the conclusions.

These methodological issues mean that any conclusions regarding negligible or non-significant effects rest on assumptions rather than solid evidence. The lack of adequate baseline data also hinders meaningful evaluations of cumulative and indirect impacts, including seasonal variations and interactions within the broader ecosystem. This uncertainty raises concerns regarding the true extent of risks to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The degree of uncertainty introduced impedes the ability to exclude adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these factors, consent cannot be granted lawfully.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is fundamentally flawed and fails to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts a simplistic viewpoint, treating heritage as isolated and static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

A significant shortcoming is evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites of burial and spiritual practice; however, the assessment erroneously categorises them as static features, ignoring their continued relevance and the implications of development on their surroundings. This misrepresentation leads to an incomplete assessment of cultural impacts and overlooks their integral role in community life.

Moreover, the application fails to consider intangible cultural heritage, which encompasses the Gaelic language, traditions, and the longstanding relationship between the community and the coastal environment. These aspects are fundamental to the identity of the area but are entirely omitted from the assessment, representing a significant oversight. Without acknowledging these elements, it is impossible to fully comprehend the cultural implications of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity, recognised as having characteristics of an Indigenous People, yet the process of Free, Prior and Informed Consent has not been conducted. This lack of meaningful engagement undermines the legitimacy of the assessment and neglects to reflect established principles regarding participation in decisions that impact cultural and environmental interests.

A critical procedural deficiency is 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. This omission alone renders a lawful determination unachievable.

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

Overall, the lack of assessment regarding 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 fails to provide a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development lacks a comprehensive assessment of social impacts, health, and wellbeing, raising significant concerns regarding transparency and compliance with legal evaluation standards. Although the developer has commissioned a Social Impact Assessment that included focus groups with local residents, the complete report remains unpublished. This absence of information creates a crucial evidential gap, hindering both public understanding and the competent authority's ability to evaluate the full extent of social risks identified in the developer's own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These reported impacts are based on direct engagement with the community and are therefore substantiated rather than speculative. However, the failure to disclose the full assessment prevents proper scrutiny of these findings and constrains the ability to assess their significance in the decision-making process.

Furthermore, the proposal is perceived as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this acknowledgment, the application has not adequately integrated these impacts or assigned them appropriate weight. By withholding the complete 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. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, particularly when they may affect community character and functioning. Without access to the complete dataset, the application falls short of providing a full evidential basis for balancing potential benefits against harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments should foster positive health outcomes and mitigate harm; however, the available evidence suggests existing adverse effects that remain undisclosed. Without the complete assessment, compliance with this policy is unproven.

The implications of this procedural deficiency are significant. The competent authority cannot perform a thorough socio-economic and health evaluation without the full Social Impact Assessment, representing a material omission within the application. This failure to meet evidential requirements of the Environmental Impact Assessment regime ultimately renders the assessment incomplete and unreliable. Consequently, a lawful determination cannot be made, reinforcing the conclusion that the application lacks sufficient information to be supported.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and a strong sense of remoteness, aspects that are integral to its undeveloped nature. The introduction of large-scale turbines near the shoreline threatens to impose a continuous industrial presence, which would fundamentally alter this unique character. This change would result in a permanent and irreversible transformation of the landscape, overshadowing the natural beauty that defines the area.

Concerns regarding the assessment of visual impacts are significant. The application fails to accurately represent the magnitude of change that would occur. The sheer scale and close proximity of the turbines mean that they would dominate views from residential areas and historic sites, as well as from popular coastal locations. Such dominance would erode the visual amenity and diminish the defining qualities of naturalness and remoteness within this sensitive landscape, yet this level of impact is not adequately conveyed in the assessment.

Methodological issues also arise concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints do not sufficiently capture the most sensitive receptors or worst-case scenarios, particularly related to key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact may have been understated, which undermines the credibility of the assessment.

Moreover, there is a failure to evaluate the interconnected relationships between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are interlinked with the wider landscape, sharing visual and spatial connections to the Atlantic horizon. However, the assessment treats these sites as isolated entities, neglecting their interdependence, which results in an incomplete understanding of how the proposal would impact their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are experienced and severing their ties to the natural horizon. This is not merely a visual issue; it represents a broader cultural and spatial harm that has not been thoroughly assessed within the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The scale of proposed changes contradicts the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a robust worst-case assessment further weakens any argument for policy compliance.

It is clear that the identified impacts cannot be effectively mitigated. The dominance of the turbines due to their scale, height, and proximity means that their presence would be unavoidable. Consequently, the change would be fundamental and permanent, not something that could be reduced to an acceptable level through mitigation measures.

In conclusion, the assessment is inadequate in representing the extent of the impact,

the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation, reinforcing the conclusion that the proposal is incompatible with the preservation of this landscape.

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 notable for its exceptionally dark skies, which are essential to the area's environmental quality, cultural identity, and tourism appeal. The proposal introduces permanent red aviation lighting that would be visible over long distances, creating an intrusive “wall of light” across the western horizon and fundamentally changing the night-time environment. The Environmental Impact Assessment does not address the impact of this lighting on visual amenity, landscape character, or the experience of both residents and visitors, which is a significant oversight given the importance of dark skies to the region and to emerging tourism sectors like astro-tourism.

Furthermore, there is a complete lack of evaluation concerning the effects of this lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting, which can result in disorientation and increased collision risks. The application fails to include any assessment of lighting impacts or a phototaxis study, neglecting to evaluate how aviation lighting might affect these species or contribute to increased mortality rates.

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

Without a proper assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would suffer adverse effects. The evidential standard required to exclude adverse impacts beyond reasonable scientific doubt has not been met, engaging the precautionary principle and obstructing a lawful determination.

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

In summary, the absence of any assessment of dark skies and nocturnal wildlife represents a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis results in an incomplete application that cannot support a lawful determination.

TOURISM

The application fails to adequately assess the impacts on tourism, which is a vital sector for the Isle of Lewis economy. The area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness are essential draws for visitors.

Notably, 86% of tourists are attracted by the scenery. However, there is no quantified analysis of how the proposed large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution from tourism.

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

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

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements of sustainable development when assessed against statutory duties, national policy, and evidential standards. This application 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. Now, it is submitted under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The application does not offer a complete or reliable evidential basis for determination. It presents critical gaps in baseline data, relies on an undefined design envelope, and depends on unspecified mitigation measures. Furthermore, it omits essential impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete, hindering a full understanding of likely significant effects or residual impacts.

There are significant procedural failures present. The lack of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018. Additionally, failing to disclose the complete Social Impact Assessment is a material omission. These shortcomings inhibit the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

The proposal conflicts with National Planning Framework 4, as it does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage. It also fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit because there is no tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been properly assessed, concealing effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The required evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, which invokes the precautionary principle and prevents a lawful conclusion that impacts are acceptable.

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

In conclusion, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority must refuse consent on these grounds or utilise the relevant regulatory provisions to obtain the missing information.

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

Additional Comments

Wildlife impacts:

Wind turbines can harm birds and bats through collisions. This is especially an issue along migration routes or in habitats with sensitive species. Bats are also affected by

pressure changes near spinning blades, which can damage their lungs (a phenomenon tied to barotrauma). Careful site selection and newer shutdown strategies during peak migration help reduce this.

Habitat disruption:

Building wind farms—especially onshore—can fragment habitats. Roads, foundations, and power lines may disturb ecosystems and displace animals, even if the turbines themselves occupy relatively small footprints.

Visual and landscape impact:

Large turbines can alter the appearance of natural landscapes, particularly in scenic or rural areas. This is subjective, but it's a common concern in planning disputes.

Noise and shadow flicker

Turbines generate a low-level mechanical and aerodynamic noise. There's also "shadow flicker," where rotating blades cast moving shadows that can be irritating for nearby residents and potentially affect wildlife behavior.

Offshore ecosystem effects:

Offshore wind farms can disturb marine environments during construction (e.g., pile driving noise affecting fish and marine mammals). However, some studies show turbine foundations may also act as artificial reefs, attracting marine life.

Material use and waste

Turbines require materials like steel, concrete, and rare earth elements. Manufacturing and transporting these have environmental costs. Disposal is another issue—especially for blades, which are difficult to recycle, though new recycling technologies are improving this.

Intermittency and land use trade-offs

Wind energy is variable, so it often needs backup systems or storage, which can introduce additional infrastructure impacts. Wind farms also require large areas compared to more energy-dense sources, though the land between turbines is often still usable (e.g., for farming).

Voice

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: AB772913

Member of the public 1979

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a review of the Environmental Impact Assessment Report and supporting documents. It highlights deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, nearly pristine environment, and strong cultural identity. The proposal's scale, proximity, and design raise serious concerns about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for lawful determination. Missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal all contribute to this inadequacy. The use of a flexible design framework obscures a clear understanding of the likely significant effects, and the reliance on unspecified mitigation measures prevents assessment of their effectiveness. Consequently, the documentation does not facilitate a complete or informed understanding of the environmental, cultural, or community impacts. The claims of negligible or non-significant effects are not backed by robust evidence.

There are significant conflicts with established policy. The proposal does not appear to align with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It fails to demonstrate that it can meet national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests needed for consent and impair the competent authority's ability to determine that the development is policy-compliant.

The scale of the proposal is unprecedented for this area, with large turbines sited in close proximity to the shoreline, raising significant concerns about landscape capacity, visual impact, and environmental repercussions. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy demonstrates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks comprehensiveness and fails to deliver a transparent and reliable analysis of the potential environmental consequences of the proposed development. By employing a flexible Project Design Envelope that lacks concrete commitments to specific turbine dimensions, layouts, or configurations, the report introduces considerable uncertainty. This approach obstructs the consistent application of a worst-case scenario analysis, thereby undermining the integrity of the assessment. Consequently, the impacts indicated may not accurately represent the actual development that will be constructed, which in turn hinders both public understanding and the competent authority's capacity to grasp the full extent of environmental implications.

Furthermore, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that have yet to be clearly defined. Seeking consent on the premise that environmental harm will be rectified at a future date obstructs any thorough evaluation of the effectiveness of such measures or an assessment of residual impacts. This postponement of critical information until after consent is granted is procedurally unacceptable, as it contravenes the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly established prior to determination.

The application also exhibits significant evidential gaps, including deficiencies in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. These issues result in uncertainty concerning the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting evidence. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, thus introducing scientific uncertainties that are incompatible with statutory obligations.

As a result, the application does not fulfil the evidential standards required under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, specifically its requirements for biodiversity protection and environmental integrity, as it has not been proven that impacts have been comprehensively assessed or that appropriate safeguards exist.

In summary, the combination of an undefined design envelope, the absence of specific mitigation strategies, and existing gaps in baseline data collectively render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings preclude a lawful and thorough evaluation of environmental effects, thereby leaving the competent authority unable to make an informed decision based on the information presented.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed, resulting in a lack of a complete and reliable understanding of the ecological receptors

within the West Lewis coastal environment. This area is recognised as a highly sensitive and biologically active marine system, yet the methodologies employed and the baseline data provided are insufficient to capture the presence, behaviour, and habitat use of the relevant species. Consequently, the assessment fails to establish a solid evidential basis for evaluating potential impacts.

Notably, there is a significant oversight regarding otters, which are classified as a European Protected Species. The application neglects to adequately acknowledge and evaluate their active utilisation of coastal areas for foraging and movement. The assessment does not consider their core foraging range or behavioural patterns, resulting in an inadequate appraisal of the potential effects stemming from construction disturbance, noise, and increased activity. This lack of analysis undermines any conclusions drawn about the absence of significant effects on the otter population.

The evaluation of basking sharks similarly suffers from methodological shortcomings, particularly due to an overreliance on aerial surveys that introduce considerable detection bias, especially under Atlantic conditions. This approach is likely to underestimate the presence of basking sharks when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate relevant data further contributes to an incomplete baseline and diminishes the credibility of the conclusions reached.

These methodological deficiencies mean that the assertions of negligible or non-significant effects are predicated more on assumptions than on substantiated evidence. The lack of adequate baseline data also inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variations and interactions within the wider ecosystem. As a result, there remains significant uncertainty about the true scale of risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements established by the Environmental Impact Assessment regime and National Planning Framework 4, as there has been a failure to properly identify or assess protected species. The level of uncertainty introduced by the deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it follows that consent cannot be lawfully granted.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

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

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

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

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

In summary, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interconnected nature of the landscape and

heritage. These shortcomings hinder a reliable evaluation and strongly indicate that the proposal is incompatible with the protection of this landscape.

FISHERIES AND MARINE LIFE

The proposal concerning the waters off the West Lewis coast is fundamentally flawed, as it neglects to provide a thorough assessment of fisheries and marine life. This area is home to a rich marine ecosystem and supports an active fishing industry, yet the application fails to show how these vital uses and habitats will be safeguarded from significant disruption.

A major concern lies in the unfounded assumption that fishing activities can simply be displaced without adverse effects. There is no evidence presented that alternative fishing grounds are available, accessible, or able to accommodate increased pressure from displaced fishing efforts. This lack of information is critical, as such displacement could lead to overfishing in other areas and would have broader economic repercussions for the local fishing fleet. Without a clear, evidence-backed evaluation, the implications for fisheries and local livelihoods remain vague and concerning.

Moreover, the application raises significant risks to marine species, particularly due to the underwater noise generated during construction activities. The high-energy hammer piling anticipated over a prolonged period is likely to disturb marine life across large distances, notably impacting species such as dolphins. The projected disruption to a substantial portion of the local bottlenose dolphin population is alarming, yet the application minimizes the seriousness of these effects without adequate supporting evidence.

The document also exhibits glaring contradictions; it acknowledges the necessity for licenses to permit harm to European Protected Species while simultaneously stating that the anticipated impacts are negligible. This inconsistency severely undermines the assessment's credibility and raises questions about adherence to the Habitats Regulations, particularly when harm is expected to an extent that necessitates legal authorisation.

Furthermore, the assessment lacks consideration of cumulative impacts stemming from various pressures such as habitat disruption, noise pollution, and the displacement of fishing activities. Without an all-encompassing evaluation of these combined effects, it is impossible to accurately ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not convincingly demonstrate compliance with 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 repercussions on marine biodiversity, which hinders any determination 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 contradictions throughout the application culminate in an incomplete and unreliable assessment. These shortcomings impede a thorough evaluation of the impacts on marine life and fisheries.

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 wish to formally object to the proposed N4 “Spiorad na Mara” offshore wind farm on the Isle of Lewis.

While I recognise the importance of renewable energy, I have serious concerns about the scale, location, and long-term impact of this development. The proposal includes up to 60 turbines reaching heights of around 338 metres and positioned as close as 6 km from shore, alongside extensive onshore infrastructure and transmission across sensitive peatland environments. [?]

I am particularly concerned about the cumulative environmental, visual, and cultural impact on the island. The west coast landscape of Lewis is internationally valued for its natural beauty, wildlife, and cultural heritage. Industrial-scale development of this nature risks fundamentally altering that landscape, with potential consequences for tourism, biodiversity, and the wellbeing of local communities. [?]

There are also concerns regarding insufficient community consultation and the perception that decisions of this magnitude are being driven by external commercial interests rather than the needs and wishes of local people. [?]

I believe that renewable energy development must be carefully balanced with environmental protection, community voice, and long-term sustainability. In this case, the scale and siting of the proposal do not achieve that balance.

For these reasons, I respectfully object to this 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: 699340DB

Member of the public 1980

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 based on a thorough review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies in planning, environmental considerations, cultural impacts, and procedural integrity. The site is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the proposal's scale, proximity, and design, which challenge its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis for lawful determination. There are critical gaps in environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The flexible design framework employed hinders a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures prevents an evaluation of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust support.

Substantial conflicts with policy are evident. 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 adequately demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These inconsistencies directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to determine the development as policy-compliant.

The unprecedented scale of the proposal raises significant concerns, with large turbines planned in close proximity to the shoreline, leading to issues related to landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and cannot support a lawful determination. In this context, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and lacks a complete, transparent, and dependable account of the potential environmental effects of the proposed development. The absence of fixed turbine dimensions, layouts, or configurations due to the use of a flexible Project Design Envelope introduces considerable uncertainty. This uncertainty hinders a consistent application of a worst-case scenario, thus undermining the integrity of the assessment. As a result, the impacts outlined may not accurately reflect the actual development, limiting both public understanding and the competent authority's awareness of the true environmental consequences.

Furthermore, the application leans heavily on unspecified mitigation measures, monitoring strategies, and management plans that have yet to be established. Seeking consent on the premise that environmental harm will be mitigated at a later stage compromises the ability to conduct a thorough evaluation of these measures' effectiveness and the assessment of residual impacts. This deferral of crucial information to post-consent stages is not procedurally acceptable and contradicts the principles of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies must be clearly defined prior to any determination.

Significant evidential deficiencies are also present, including gaps in baseline data, limitations in methodology, and an overreliance on assumptions instead of site-specific evidence. This results in uncertainty surrounding the scale and significance of the impacts, especially where findings of negligible or non-significant effects are made without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory obligations.

Consequently, the application does not meet the evidential threshold established under the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, 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 remains unproven that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The marine ecology assessment related to the proposed development suffers from significant deficiencies that compromise our understanding of ecological receptors in

the West Lewis coastal environment. This area is noted for its sensitivity and biological activity, yet the data provided is incomplete, and the methodologies utilised do not adequately capture the presence, behaviour, and habitat use of species in this ecosystem. Consequently, the evidential basis for evaluating potential impacts is fundamentally flawed.

A critical oversight in the assessment involves otters, recognised as a European Protected Species. The application neglects to properly account for their active foraging and movement in coastal areas. This lack of attention to their core foraging range and behavioural patterns means that the possible impacts from construction disturbance, noise, and increased human activity have not been thoroughly assessed. Such omissions undermine any assertions regarding the absence of significant effects on otters.

Similarly, the assessment of basking sharks is inadequate, with a heavy reliance on aerial surveys that introduce significant bias in detection, particularly under typical Atlantic conditions. This methodology is likely to lead to an underestimation of their presence in the waters concerned, especially in light of established land-based observations that indicate frequent use of these areas. The failure to consider such pertinent data results in an incomplete baseline and diminishes the credibility of the conclusions drawn.

The methodological flaws present in the assessment suggest that conclusions regarding negligible or non-significant effects are founded on assumptions rather than solid evidence. Furthermore, the lack of sufficient baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, which should encompass seasonal variations and broader ecosystem interactions. This gap creates a level of uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the Environmental Impact Assessment requirements or the standards set by National Planning Framework 4, as protected species have not been sufficiently identified or assessed. This introduction of uncertainty prevents the possibility of excluding adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, it is clear that consent cannot be lawfully granted.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development is accompanied by a Social Impact Assessment commissioned by the developer, which included focus groups with local residents. However, the full report has not been published, creating a significant evidential gap that hampers understanding of the social risks identified by the developer's own

research. This lack of transparency is critical, as it prevents both the public and the competent authority from grasping the complete picture.

Available summaries suggest that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement rather than speculation. Nevertheless, the non-disclosure of the full assessment restricts proper scrutiny of these findings and inhibits the ability to assess their significance in the decision-making process.

There are indications that the proposal is seen as a direct threat to community identity and cohesion, with references to "cultural loss" emerging from the developer's own findings. Despite this, these impacts have not been thoroughly integrated into the main application or given adequate consideration. The withholding of the full Social Impact Assessment obscures the true human and social cost associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process, as a comprehensive understanding of the social, economic, and health impacts is crucial for developments of this magnitude. Particularly where community character and functioning may be influenced, the failure to provide the complete dataset results in an incomplete evidential basis for evaluating the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development must support positive health outcomes and avoid causing harm, yet the evidence available indicates that existing adverse effects have not been fully disclosed. Consequently, without the full assessment, compliance with this policy cannot be substantiated.

The procedural ramifications of these omissions 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 represents a material omission within the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, along with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment concerning seascape, landscape, and visual impacts is inadequate and does not sufficiently capture the extent of change or the sensitivity of the environment involved. The coastline of West Lewis is characterised by an open Atlantic horizon, an undeveloped nature, and a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence,

fundamentally transforming this character and leading to a permanent alteration of the landscape.

The magnitude of the anticipated visual change is not accurately represented in the application. Due to their scale and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations. This would adversely affect visual amenity and diminish the defining qualities of naturalness and remoteness. The assessment does not convey the significance of this impact appropriately within the context of such a sensitive landscape.

Methodological issues also arise concerning the selection and presentation of visual viewpoints. Evidence suggests that the chosen viewpoints may not adequately reflect the most sensitive receptors or the worst-case scenarios, particularly in relation to culturally significant sites and high-value landscapes. This raises concerns that the magnitude of visual impact has been understated, which undermines the credibility of the assessment.

Moreover, the assessment overlooks the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. Instead of recognising their interdependence, the assessment treats these assets as isolated, resulting in an incomplete evaluation of the impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal contravenes National Planning Framework 4, particularly regarding the safeguarding of natural places and historic assets. The proposed changes are inconsistent with the requirements to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case scenario analysis further undermines claims of compliance with relevant policies.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal entails significant seabed preparation and installation works in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is inadequate, lacking the detail necessary for evaluating potential environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans accompanying the application. Instead, it depends on the preparation of mitigation and contingency measures post-consent, which hinders a thorough assessment of their sufficiency and effectiveness.

This reliance on unspecified future measures is particularly alarming given the sensitivity of the receiving environment. The coastline of West Lewis is characterised by clean coastal waters and essential habitats that are susceptible to sediment disturbance and contamination. Although the application recognises risks associated with sediment mobilisation and potential chemical or oil spills, it fails to provide adequate information on the prevention, control, or monitoring of these risks.

Furthermore, there is ambiguity surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without comprehensive modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty extends to the possible effects on marine species and habitats identified as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent has been granted, the application obstructs the evaluation of whether adequate safeguards are in place to respond to pollution incidents. This introduces procedural risk and undermines the capacity of the competent authority to evaluate environmental protection measures during the determination process.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Prior to granting consent, it is imperative that likely significant effects and their mitigation are thoroughly assessed, and the absence of such information precludes a lawful determination. The application also fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the combination of undefined mitigation measures, insufficient management plans, and uncertainty about potential impacts results in a materially deficient assessment. These deficiencies obstruct a rigorous evaluation of construction and pollution risks and further corroborate the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm exhibits significant deficiencies that render it unfit for determination. The application does not fulfil the requirements for sustainable development as prescribed by statutory duties, national

policy, and evidential standards. It mirrors the fundamental issues that led to the refusal of the Lewis Wind Power proposal in 2008, notably the unacceptable scale of industrialisation. This new application, despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, fails to adequately address these concerns.

Critical gaps in baseline data undermine the evidential basis for determination. The continued reliance on an undefined design envelope and unspecified mitigation measures raises questions about the robustness of the application. Additionally, it omits vital impact pathways, including those related to nocturnal wildlife, full onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

There are also notable procedural shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the complete Social Impact Assessment is a material omission that prevents the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies collectively contribute to the application being deemed unfit for determination.

The proposal contravenes the National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. It fails to illustrate that health and wellbeing impacts are acceptable, and it cannot provide evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been appropriately assessed, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

The uncertainties surrounding environmental risks are both significant and concerning. The assessments of marine ecology, seabirds, protected species, and marine mammals lack completeness and internal consistency. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

Moreover, the proposal is set to induce substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and the disruption of cultural and visual relationships pose permanent effects that cannot be adequately mitigated.

In summary, the application demonstrates serious procedural and substantive inadequacies. The combined scale of information deficiencies, along with conflicts with established policy and unresolved environmental risks, hinder a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent on these grounds or utilises the appropriate regulatory provisions to mandate

the submission of the missing information.

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

Additional Comments

I am extremely apprehensive about the way in which this development may affect the health of my young daughter living a stone throw away from the Barvas coast. I am also deeply concerned about the way in which the construction would affect the protected machair land that we enjoy on a daily basis, in particular the beach, and the wildlife that inhabits it. I have read that the environment we would be existing in has been likened to a "living laboratory" as a development of this scale and close to proximity to civilization has not been attempted before. I do not want that for my child's future, nor for anyone's.

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: C9374B47

Member of the public 1981

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, submitted under the marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and related documentation, highlighting significant deficiencies in planning, environmental protection, cultural considerations, and procedural integrity. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. Concerns about the proposal's scale, proximity, and design challenge its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a solid evidential basis for lawful determination. There is a notable absence of critical environmental data, with baseline information being both limited and inconsistent, and key elements of the proposal remain undefined. The flexible design framework employed hampers a comprehensive understanding of potential significant effects. Moreover, the proposed mitigation measures have yet to be detailed, leaving their effectiveness unassessable. Consequently, the documentation does not facilitate a complete or informed understanding of environmental, cultural, or community impacts, making the claims of negligible or non-significant effects unsubstantiated by robust evidence.

Substantial conflicts with policy 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 places, cultural heritage, and the health and wellbeing of the community. It fails to prove that national standards for protecting biodiversity, climate interests, and environmental integrity can be fulfilled. These discrepancies directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to assess the development's acceptability in policy terms.

The scale of this proposal is unprecedented in this region, featuring large turbines in close proximity to the shoreline, which raises serious concerns about landscape capacity, visual dominance, and environmental impact. The lack of sufficient information, the reliance on unspecified mitigation measures, and evident policy non-compliance collectively indicate that the application is incomplete and incapable of supporting a lawful determination. Under these circumstances, adherence to the precautionary principle is essential.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and does not deliver a comprehensive, transparent, or dependable evaluation of the potential environmental impacts associated with the proposal. The introduction of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty hinders the consistent application of a worst-case scenario, compromising the assessment's integrity. Consequently, the impacts described may not represent the actual development, impeding both public and competent authority comprehension of the true extent of environmental effects.

Additionally, the application places considerable reliance on unestablished mitigation measures, monitoring strategies, and management plans. Seeking consent on the premise that environmental harm will be addressed later obstructs any meaningful assessment of effectiveness or evaluation of residual impacts. This deferment of crucial information to post-consent stages is procedurally improper and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigations must be clearly outlined before a decision is made.

Furthermore, the report exhibits substantial evidential deficiencies, including inadequacies in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. Such gaps contribute to uncertainty regarding the magnitude and significance of impacts, especially where claims of negligible or non-significant effects are made without robust supporting data. The lack of adequate information inhibits a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainties that are incompatible with statutory obligations.

As a result, the application does not satisfy the evidential threshold required under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal similarly fails to demonstrate alignment with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it remains unproven that impacts have been comprehensively evaluated or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application fails to meet the statutory requirements of the Environmental Impact Assessment regime, particularly in its assessment of alternatives. Instead of a thorough

and reasoned comparison of realistic alternatives based on their environmental effects, it offers a narrative detailing the evolution of the project. This method does not convincingly demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

Moreover, there is a notable lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. The application notably does not show that the developer has adequately considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be mitigated. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impacts further highlight the absence of this analysis, which undermines any claims that the proposed siting is the least damaging option.

Additionally, the deficiencies extend to cable routing and landfall assessment, revealing insufficient evidence that alternative routes have been thoroughly explored to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis signifies that mitigation by design has not been effectively applied, leading to a reliance on post-design mitigation measures instead.

Ultimately, the application does not show that environmental harm has been minimised through the careful selection of site, layout, and routing of infrastructure. This reflects a failure to adhere to the established mitigation hierarchy and obstructs the competent authority's ability to ascertain the existence of less harmful and more suitable alternatives. Without a comprehensive assessment of alternatives, it cannot be affirmed that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment represents a material omission, reinforcing the conclusion that the application has not been properly assessed and is incapable of supporting a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage along the West Lewis coastline is a vital aspect of community identity, yet the assessment of this development disregards it as a dynamic cultural landscape, merging environment, language, tradition, and community. Instead, it treats heritage as mere static assets, neglecting their significant social, cultural, and spiritual roles within the community.

There is a notable shortfall in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are characterised. These sites are active burial grounds and places of spiritual significance, but the assessment simplistically categorises them as unchanging features. This failure to recognise their ongoing use and meaning, along

with the potential impact of the development on their surroundings, leads to an incomplete understanding of the cultural ramifications and overlooks their significance in community life.

Moreover, the assessment neglects to address intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These elements are crucial to the area's identity but are entirely omitted from the evaluation, representing a serious oversight. Understanding the cultural impact of the development is impossible without these considerations.

Concerns also arise regarding the rights and engagement of the community. The Gaelic-speaking population embodies a distinct cultural identity, with characteristics that align with those of Indigenous Peoples. However, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and fails to adhere to established participatory principles in decisions impacting cultural and environmental interests.

A significant procedural oversight is the non-compliance with the statutory requirement for an Island Communities Impact Assessment under the Islands (Scotland) Act 2018. The absence of this assessment obstructs the competent authority's ability to legally assess the social, cultural, and economic implications for the island community. This omission alone invalidates the determination process.

From a policy standpoint, these inadequacies put the proposal in direct opposition to National Planning Framework 4, particularly regarding the protection of historical assets and places. The neglect of both tangible and intangible heritage, alongside the disregard for living cultural practices, signifies a clear departure from policy standards.

In summary, the failure to adequately consider living heritage, intangible cultural values, community rights, and statutory requirements results in a considerable evidential gap. The cultural implications of the development remain unassessed, and the application does not furnish a robust foundation for understanding the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full report of the Social Impact Assessment commissioned by the developer has not been published, creating a significant evidential gap. This lack of transparency means that both the public and the competent authority cannot grasp the complete scope of social risks identified through the developer's own research. Available summaries suggest that residents are facing 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 based on actual experiences rather than speculation. However, without access to the full assessment, proper scrutiny of these findings is hindered, limiting the ability to evaluate their importance in the decision-making process.

Furthermore, the proposal is seen as a threat to community identity and cohesion, with the developer's own findings highlighting concerns about "cultural loss." Despite this, such impacts have not been fully considered in the main application or given adequate weight. The withholding of the complete Social Impact Assessment obscures the true human and social costs of the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning may be at stake. By failing to provide the complete dataset, the application lacks a solid evidential basis for balancing benefits against harm.

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

The procedural implications are serious. The competent authority cannot carry out a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a significant omission within the application and fails to meet the evidential requirements of the Environmental Impact Assessment regime.

Overall, the non-disclosure of the complete Social Impact Assessment, along with evidence of existing negative impacts, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is home to clean coastal waters and important habitats that are particularly sensitive to sediment disturbance and contamination. The proposed project involves significant seabed preparation and installation works within the challenging conditions of a high-energy Atlantic environment. However, the assessment of construction and pollution risks associated with this proposal is incomplete, lacking the detail necessary to properly evaluate the likely environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans presented in the application. Instead, it relies on mitigation and contingency measures that are intended to be prepared post-consent, which prevents 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. While the application acknowledges risks, including sediment mobilisation and accidental chemical or oil spills, it does not provide sufficient information on how these risks will be prevented, controlled, or monitored. Furthermore, 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 determine the extent, duration, or ecological effects of these potential impacts, including those on marine species and habitats already identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By deferring contingency planning to a post-consent phase, the application undermines the ability of the competent authority to evaluate whether appropriate safeguards are in place to address pollution events. This introduces procedural risks and compromises environmental protection measures that should be assessed at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime, which mandates that likely significant effects and necessary mitigation must be evaluated prior to consent. The absence of defined mitigation measures, detailed management plans, and clarity on potential impacts collectively render the assessment materially deficient. These shortcomings highlight the inadequacy of the application and further support the conclusion that it is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of fisheries and marine life within the application is inadequate, failing to provide a thorough assessment of ecological and socio-economic impacts. The fishing industry along the West Lewis coast is active and vital, and the marine ecosystem in these waters is diverse. However, the proposal does not adequately demonstrate that these essential habitats and activities can be preserved without significant disruption.

One major concern is the assumption that fishing activities can be displaced without adverse effects. The application lacks any evidence that alternative fishing grounds exist, are accessible, or have the capacity to support increased pressure. This critical omission poses risks of overfishing in alternative locations and may lead to broader economic ramifications for the local fishing fleet. In the absence of a clear and evidence-based assessment, the implications for fisheries and associated livelihoods remain unclear.

The proposal also introduces considerable risks to marine species due to the anticipated underwater noise from construction activities. The prolonged use of high-energy hammer piling is likely to create disturbances over large distances, particularly affecting dolphins. The projected disruption to a significant segment of the local bottlenose dolphin population is alarming, yet the application minimizes these effects without sufficient supporting evidence.

There exists a notable contradiction within the application regarding the need for licenses to harm European Protected Species, while simultaneously characterising the impacts as negligible. This inconsistency undermines the credibility of the assessment

and raises serious concerns about compliance with the Habitats Regulations, particularly when harm is anticipated at a level that necessitates legal authorisation.

Furthermore, the assessment neglects to consider cumulative impacts resulting from a combination of factors, including habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these interconnected effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application falls short of demonstrating adherence to the National Planning Framework 4 or the National Marine Plan. It does not prove that the proposed development can coexist with current marine users or avoid unacceptable harm to marine biodiversity, precluding any conclusion that the project embodies sustainable development.

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal demonstrates significant failures in meeting the criteria for sustainable development, particularly when evaluated against statutory duties, national policy, and evidential standards. Notably, the application mirrors the critical issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, specifically regarding the unacceptable scale of industrialisation. While the current proposal is submitted under a more robust policy framework emphasising biodiversity, peatland protection, landscape integrity, and community wellbeing, it nonetheless falls short.

There are substantial shortcomings in the evidential basis provided for this application. It lacks complete baseline data and relies on a design envelope that remains undefined. Furthermore, the proposal does not specify the mitigation measures that would be applied and omits essential impact pathways, including those affecting nocturnal wildlife, the entirety of onshore infrastructure, and the implications for tourism. As a result, the Environmental Impact Assessment is incomplete, inhibiting a comprehensive understanding of the likely significant effects and residual impacts.

In addition to these evidential gaps, there are notable procedural deficiencies. The lack of a compliant Island Communities Impact Assessment contravenes the statutory obligations under the Islands (Scotland) Act 2018. Moreover, the failure to present a full Social Impact Assessment constitutes a significant omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal also contradicts National Planning Framework 4, as it does not adequately protect biodiversity, natural environments, and cultural heritage. It fails to demonstrate that health and wellbeing impacts are acceptable and does not provide evidence of a net economic benefit, as there is a lack of tourism impact modelling. Additionally, 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 uncertainty surrounding environmental risks is another critical issue. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some cases, inconsistent. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, combined 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.

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: 3FA07D20

Member of the public 1982

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. This objection arises from a thorough review of the Environmental Impact Assessment Report and supporting documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns have been raised regarding the proposal's compatibility with statutory requirements, national policy, and the principles of sustainable development, particularly given its scale, proximity to the shoreline, and design.

The application lacks an adequate evidential basis for a lawful determination. There is a notable absence of critical environmental data, while baseline information is found to be limited and inconsistent. Furthermore, key aspects of the proposal remain undefined. The application employs a flexible design framework, which obscures a clear understanding of potential significant effects. Additionally, the reliance on unspecified mitigation measures renders their effectiveness impossible to assess. Consequently, the documentation fails to provide a comprehensive or informed understanding of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence.

The proposal presents clear and substantive conflicts with established policies. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests essential for consent and undermine the capability of the competent authority to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal raises considerable concerns regarding landscape capacity, visual dominance, and overall environmental impact due to the large turbines' proximity to the shoreline. Collectively, the lack of sufficient information, dependence on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application presents a range of significant evidential deficiencies that critically undermine the assessment process. There are notable gaps in baseline data, limitations in the methodology employed, and an over-reliance on assumptions instead of site-specific evidence. Such shortcomings lead to uncertainty regarding the scale and significance of impacts. This is particularly concerning where the application presents conclusions of negligible or non-significant effects without robust supporting data. The lack of comprehensive information obstructs a clear understanding of both cumulative and worst-case impacts, introducing a level of scientific uncertainty that is incompatible with statutory requirements.

Furthermore, the Environmental Impact Assessment Report is materially deficient, lacking a complete, transparent, or reliable account of the likely environmental effects of the proposal. The employment of a flexible Project Design Envelope, without firm commitments to specific turbine dimensions, layouts, or configurations, adds a layer of significant uncertainty. This approach prevents the consistent application of a worst-case scenario, undermining the integrity of the assessment and obscuring the true extent of environmental effects from both the public and the competent authority.

The reliance on unformulated mitigation measures, monitoring strategies, and management plans represents another critical issue. As consent is sought based on the premise that any environmental harm will be mitigated at a later stage, this deferral inhibits any meaningful evaluation of effectiveness or assessment of residual impacts. Such postponement of key information to post-consent stages is procedurally unacceptable and contravenes the intent of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before determination.

As a result of these substantial deficiencies, the application does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This circumstance invokes the precautionary principle, particularly with regard to protected species and sensitive habitats. Additionally, the proposal fails to comply with National Planning Framework 4, as it does not adequately demonstrate 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, and significant gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and robust evaluation of environmental effects and leave the competent authority unable to make a well-informed determination based on the information presented.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species is fundamentally flawed, failing to deliver a thorough and dependable understanding of the ecological receptors within the West Lewis coastal environment. This area is biologically active and sensitive, yet

the baseline data provided is inadequate, and the methodologies used do not effectively capture species presence, behaviours, and habitat utilisation. Consequently, the assessment lacks a solid evidential foundation necessary for assessing potential impacts.

A significant oversight in this application is the inadequate recognition of otters, classified as a European Protected Species. Their use of coastal areas for foraging and movement has not been properly evaluated. The absence of consideration regarding their core foraging range and behavioural patterns means that the potential effects of disturbances due to construction, noise, and increased activity remain unassessed. This shortcoming casts doubt on the conclusions drawn about the absence of significant effects on this species.

In addition, the assessment of basking sharks is problematic. The reliance on aerial surveys leads to considerable detection bias, especially under Atlantic conditions, likely resulting in an underestimation of their presence. This is particularly evident when compared to established land-based observations that indicate regular use of these waters. The failure to appropriately incorporate or consider such information results in an incomplete baseline and undermines the reliability of the presented conclusions.

The limitations in methodology mean that the assertions of negligible or non-significant effects are grounded in assumptions rather than solid evidence. The lack of adequate baseline data also hinders a meaningful assessment of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This introduces uncertainty about the real risks to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment requirements and the National Planning Framework 4, as it has not properly identified or evaluated the protected species present. The uncertainty created by these deficiencies prevents the dismissal of adverse effects with reasonable scientific certainty, necessitating the invocation of the precautionary principle. Under these conditions, granting consent would be unlawful.

In summary, the combination of insufficient baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These inadequacies hinder a rigorous evaluation of impacts on marine ecology and protected species, leading to the overarching conclusion that the application does not possess a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment contains significant gaps and inconsistencies that undermine its findings. It is crucial to note that the development is situated within key foraging areas and migratory pathways for seabirds. However, the application does not provide adequate evidence to show that these internationally important seabird populations, many of which are in decline, will not be adversely affected. There is a lack of robust evaluation regarding the potential risks of displacement, collision, and habitat

loss.

Moreover, a fundamental contradiction arises within the application, which states there will be no significant adverse effects while simultaneously putting forward a Habitats Regulations derogation case. This derogation is only necessary when significant harm is anticipated. Such inconsistency raises doubts about the reliability of the assessment, suggesting that its conclusions are not well-supported by the available evidence.

The assessment fails to adequately demonstrate that seabird species linked to protected sites like the Lewis Peatlands and St Kilda will remain unaffected. The importance of these feeding areas is not fully acknowledged, and the reliance on modelling techniques introduces further uncertainty, particularly concerning species like Kittiwakes and Fulmars, which are already in severe decline. The methodologies used are likely to underestimate mortality rates, particularly given the incomplete baseline data and the lack of understanding of behavioural responses.

Additionally, the placement of turbines within a recognised migratory corridor poses a significant risk. This situation creates a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The assessment does not thoroughly consider the long-term effects of sustained mortality in this corridor or the implications for species with relatively small global populations.

From a regulatory standpoint, the application does not meet the necessary evidential standard to conclude no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, means that the requisite standard of beyond reasonable scientific doubt has not been reached. This situation engages the precautionary principle and hinders a lawful conclusion in favour of consent.

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

In summary, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These issues prevent a thorough evaluation of impacts and ultimately contribute to the conclusion that the application does not satisfy the statutory requirements needed for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The current assessment of cultural heritage and community identity is deeply flawed and does not recognise the West Lewis coastline as a vibrant cultural landscape. Here, the environment, language, tradition, and community are inextricably linked. Instead of appreciating the dynamic social, cultural, and spiritual roles that heritage plays, the application reduces it to mere isolated and static assets.

A significant shortcoming is evident in the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites of burial and spiritual practice, but the assessment inaccurately categorises them as static features, neglecting their ongoing use, significance, and the potential impact of development on their surroundings. This mischaracterisation leads to a failure in evaluating the cultural effects and overlooks their importance in community life.

Moreover, the assessment neglects 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 yet are completely omitted from consideration, creating a substantial gap in understanding the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity associated with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and fails to adhere to established principles of participation in decisions that affect cultural and environmental interests.

A crucial procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic effects on the island community, making this omission a barrier to lawful determination.

From a policy standpoint, the identified deficiencies place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. Ignoring both tangible and intangible heritage, along with failing to acknowledge living cultural practices, represents a clear deviation from policy requirements.

Ultimately, the lack of assessment regarding 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 addressed, and the application does not furnish a solid foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents, but the full report has not been made public. This lack of disclosure creates a significant evidential gap, hindering both the public and the competent authority from understanding the full extent of social risks identified by the developer's own research. Available summaries suggest that residents are already feeling stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement, not speculation. However, without

access to the complete assessment, proper scrutiny of these findings is not possible, which limits the ability to evaluate their significance in the decision-making process.

There is evidence that the proposal is seen as a threat to community identity and cohesion, with “cultural loss” highlighted in the developer’s findings. Despite this, these impacts have not been adequately considered in the main application. The withholding of the full Social Impact Assessment conceals the true human and social costs of the development. This lack of transparency undermines the Environmental Impact Assessment process. Understanding the social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at risk. Without the complete dataset, the application does not provide a comprehensive basis for assessing the balance between benefits and harm.

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

The implications of these procedural issues are significant. The competent authority cannot perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This constitutes a material omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime. In summary, the non-disclosure of the full Social Impact Assessment, alongside evidence of current adverse impacts, leads to an incomplete and unreliable assessment. This ultimately prevents a lawful determination and confirms that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts associated with the proposed development is fundamentally flawed and does not accurately reflect the significant scale of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, its largely undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines in close proximity to the shoreline would establish an industrial presence that is continuous and dominant, leading to a permanent and irreversible transformation of this landscape character.

Moreover, the application fails to represent the true magnitude of the visual changes that would occur. Due to the size and location of the turbines, they would dominate views from nearby residential areas, historic sites, and frequently visited coastal locations. This dominance would have a direct adverse effect on visual amenity, undermining the essential qualities of naturalness and remoteness that define this area. The assessment does not adequately convey the significance of these impacts within the context of such a sensitive landscape.

There are serious methodological issues regarding the choice and presentation of

visual viewpoints. Evidence indicates that the selected viewpoints may not effectively capture the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises concerns that the extent of visual impact may have been underestimated, thereby compromising the reliability of the assessment.

Another critical shortcoming lies in the failure to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape framework, linked visually and spatially to the Atlantic horizon. The assessment treats these heritage assets as discrete entities, neglecting their interdependencies, which results in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are perceived and severing their ties to the natural horizon. This is not merely a visual impact; it represents a wider cultural and spatial detriment that has not been sufficiently considered in the application.

From a policy standpoint, this proposal is at odds with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of change proposed is incompatible with the imperative to maintain landscape character, visual amenity, and the setting of culturally significant sites. The absence of a comprehensive worst-case assessment further undermines any assertion of policy adherence.

It is evident that the identified impacts are not amenable to effective mitigation. Given the scale, height, and proximity of the turbines, their presence would be prominent and inescapable. The resulting changes are therefore fundamental and permanent, and cannot be reduced to an acceptable level through any form of mitigation.

In conclusion, the assessment fails to adequately depict the true extent of the impacts, the sensitivity of the environment, and the interconnected nature of the landscape and heritage. These deficiencies hinder a trustworthy evaluation and underscore the incompatibility of the proposal with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies in its assessment of construction and pollution risks, which are essential for evaluating potential environmental effects. It entails extensive seabed preparation and installation activities within a high-energy Atlantic environment, yet lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. The application instead proposes to rely on mitigation and contingency measures that would be formulated after consent, which hinders any substantial assessment of their sufficiency or effectiveness.

This reliance on unspecified future measures is alarming, particularly in light of the sensitive nature of the receiving environment. The West Lewis coastline is home to

clean coastal waters and critical habitats that are susceptible to sediment disturbance and contamination. While the application recognises risks such as sediment mobilisation and accidental chemical or oil spills, it does not offer adequate detail on methods for prevention, control, or monitoring of these risks.

Moreover, there remains uncertainty regarding the scale and dynamics of sediment plumes generated from seabed disturbance and cable installation. In the absence of rigorous modelling and explicitly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty extends to possible effects on marine species and habitats already identified as sensitive within the broader assessment.

The lack of thorough emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether suitable safeguards are available to address pollution incidents. This situation not only introduces procedural risk but also undermines the capacity of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of crucial environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated prior to granting consent, and the absence of such information renders any lawful determination impossible. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the combination of undefined mitigation measures, insufficient management plans, and uncertainty about potential impacts renders the assessment materially inadequate. These inadequacies obstruct a thorough evaluation of construction and pollution risks and further substantiate the assertion that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application regarding the project is fundamentally flawed, as it does not provide a complete assessment of onshore infrastructure. The offshore turbines are closely connected to the onshore works, yet these elements have been evaluated separately. This fragmented approach masks the true extent of the environmental and socio-economic impacts that this integrated project will have.

Key onshore components involve extensive cabling across protected moorland and the construction of a substation near Stornoway, along with necessary access routes that traverse sensitive landscapes. Excavation activities are set to occur across deep peat areas, particularly within Barvas Moor, which serves as a significant carbon store and a habitat of ecological importance. The lack of a thorough assessment regarding these impacts results in an incomplete understanding of the project's overall environmental footprint.

Crucially, the omission or postponement of onshore impact assessments obstructs the ability to fully evaluate cumulative effects. The Environmental Impact Assessment process mandates that all project components be examined collectively. However, the current separation of offshore and onshore elements leaves a gap in understanding the combined effects on peatlands, habitats, and local communities.

Moreover, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are designated for protection under policy frameworks. The application fails to convincingly demonstrate that these impacts have been thoroughly assessed or that suitable avoidance measures have been implemented. This creates a significant evidential shortfall concerning biodiversity protection.

Concerns are also raised regarding the carbon balance involved in this proposal. Disturbance of peatland areas leads to the release of stored carbon, potentially resulting in a carbon debt that counters the goals of renewable energy advancement. The application inadequately addresses this critical issue or provides assurance that the overall carbon balance remains favourable.

Furthermore, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is a lack of evidence indicating that the necessary consents or processes have been initiated, leading to uncertainty about the project's feasibility and lawful execution.

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

In conclusion, the separation of project components, the absence of a comprehensive assessment, and insufficient evidence regarding environmental and land use impacts culminate in a submission that is incomplete and unreliable. This situation precludes a lawful determination of the project.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value. However, the Environmental Impact Assessment fails to consider the impacts of the proposed permanent red aviation lighting. This lighting would create a persistent "wall of light" effect that could drastically change the night-time environment.

Furthermore, the application does not evaluate how this lighting would affect visual amenity, landscape character, or the experiences of both residents and visitors. Given the significance of dark skies for the area's identity and the rise of astro-tourism, this oversight is considerable. The absence of this assessment leaves a gap in

understanding the landscape and environmental impacts.

Additionally, there is no analysis of the potential effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can disorient them and increase their risk of collision. The application lacks a lighting impact assessment or a phototaxis study to determine how the aviation lighting may affect these species or contribute to increased mortality rates.

This issue is worsened by the use of daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, but this has not been assessed. The lack of site-specific night-time data represents a critical gap in understanding ecological impacts.

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

From a policy standpoint, these omissions violate the National Planning Framework 4 concerning the protection of natural spaces and environmental quality. Moreover, they undermine the overall assessment of landscape and seascape impacts, as night-time character is an essential aspect of the environment.

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the requirements of sustainable development, particularly when evaluated against statutory duties, national policy, and evidential standards. This proposal mirrors the fundamental issues that led to the refusal of the Lewis Wind Power application in 2008, where the unacceptable scale of industrialisation was highlighted. Although the current submission is made under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

A reliable evidential basis for determination is notably absent in the application. Critical gaps in baseline data, the reliance on an undefined design envelope, and unspecified mitigation measures contribute to this inadequacy. Furthermore, the omission of key impact pathways, such as those affecting nocturnal wildlife, the full onshore infrastructure, and tourism impacts, render the Environmental Impact Assessment

incomplete. This deficiency hinders a comprehensive understanding of likely significant effects or residual impacts.

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

The proposal directly conflicts with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural landscapes, or cultural heritage. Additionally, there is a lack of evidence to support acceptable health and wellbeing impacts, as well as a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been sufficiently assessed, which obscures the implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and at times internally inconsistent. The evidential threshold required to demonstrate that adverse effects are excluded beyond reasonable scientific doubt has not been achieved, engaging the precautionary principle and precluding a lawful conclusion regarding the acceptability of the impacts.

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

Collectively, these issues render the application both procedurally and substantively unfit for determination. The combination of significant information deficiencies, policy conflicts, and unresolved environmental risks prevents an evidence-based decision. The competent authority must either refuse consent based on these grounds or exercise the relevant regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

As a frequent visitor I was devastated to hear of this. I fear for the environment and wildlife. Just recently a sea Eagle was found (alive) with a wing severed by a turbine blade. Not to mention the desecration of a wonderful natural heritage.

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: 1C3081B3

Member of the public 1983

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is incomplete and lacks a full, transparent, and reliable depiction of the anticipated environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which does not

commit to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty and obstructs the application of a worst-case scenario. This compromises the integrity of the assessment, rendering the impacts presented potentially inconsistent with the actual development, thus hindering both public understanding and the competent authority's comprehension of the true environmental repercussions.

Consent is requested with a reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Such an approach results in environmental harm being addressed post-consent, thereby obstructing a meaningful evaluation of effectiveness and the assessment of residual impacts. This postponement of vital information to stages following consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly identified prior to determination.

Moreover, the application is characterised by significant evidential shortcomings, including gaps in baseline data, methodological limitations, and a dependency on assumptions rather than site-specific evidence. This leads to uncertainty concerning the magnitude and significance of impacts, particularly where conclusions are drawn indicating negligible or non-significant effects without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it is unsubstantiated that impacts have been comprehensively assessed or that suitable safeguards are established.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and insufficient. These shortcomings obstruct a lawful and thorough assessment of environmental effects, thereby placing the competent authority in a position where it cannot make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposed development fails to adequately assess alternatives, which does not align with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured comparison of feasible alternatives based on their environmental impacts, the application presents a narrative of the project's evolution.

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

A notable lack of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations exists. Specifically, the application does not indicate that the developer has thoroughly considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. Considering the sensitivity of the West Lewis coastline, as well as the significance of proximity to shore in assessing impact, this lack of analysis hinders the ability to conclude that the proposed siting is the least damaging option.

Moreover, the shortcomings are evident in the assessments of cable routing and landfall, where there is inadequate evidence to suggest that alternative routes have been properly examined to avoid or lessen effects on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The failure to provide a clear avoidance strategy and the absence of comparative analysis illustrate that mitigation by design has not been incorporated, leading to an overreliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This indicates a failure to adhere to the established mitigation hierarchy, which obstructs the competent authority's ability to ascertain whether more suitable and less harmful alternatives exist. Without a thorough alternatives assessment, it cannot be established that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, these deficiencies detract from compliance with National Planning Framework 4, especially concerning the protection of natural spaces, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant oversight that leads to the conclusion that the application has not undergone sufficient evaluation and cannot justifiably 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.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development does not adequately assess the cultural heritage and identity of the community, particularly along the West Lewis coastline, which is a vibrant cultural landscape where language, tradition, community, and environment are deeply intertwined. The application takes an overly simplistic view of heritage, treating it as a collection of isolated assets rather than recognising their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual observance, yet the assessment categorises them as static features, overlooking their continued significance and the potential impacts of development on their settings. This misunderstanding leads to an incomplete evaluation of cultural effects and disregards the cemeteries' integral role in community life.

Moreover, the assessment neglects intangible aspects of cultural heritage, such as the

Gaelic language, local traditions, and the enduring relationship between the community and its coastal environment. These elements are essential to the area's identity, yet they are entirely omitted from the evaluation, highlighting a crucial gap. The cultural impact of the proposed development cannot be fully comprehended without addressing these factors.

Concerns also arise regarding the rights and engagement of the community. The Gaelic-speaking population possesses a unique cultural identity that aligns with recognised characteristics of Indigenous Peoples. However, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to adhere to established principles of participation concerning cultural and environmental issues.

Additionally, there is a critical procedural flaw in 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 obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these deficiencies put the proposal at odds with the National Planning Framework 4, particularly concerning the protection of historic assets and places. The oversight of both tangible and intangible heritage, as well as the failure to acknowledge living cultural practices, signifies a clear divergence from policy requirements.

Collectively, the neglect to assess living heritage, intangible cultural values, 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 fails to provide a robust basis for understanding the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, seascape, and landscape impacts is significantly flawed and does not adequately capture the extent of change or the vulnerability of the surrounding environment. The character of the West Lewis coastline is characterised by its unobstructed Atlantic horizon, natural state, and pronounced sense of isolation. The proposed installation of large-scale turbines in close proximity to the coast would lead to a continuous and overwhelming industrial presence, which would fundamentally change this character and result in a lasting and irrevocable alteration of the landscape.

Moreover, the application inadequately conveys the scale of this visual transformation. The turbines would overshadow views from residential locations, historical sites, and popular coastal areas, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not adequately reflect this level of impact or its significance, particularly within the context of such a delicate landscape.

There are also serious methodological issues concerning the selection and representation of visual viewpoints. Evidence indicates that the chosen viewpoints might not effectively capture the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and valued landscapes. This raises concerns that the visual impact may have been underestimated, thereby compromising the assessment's reliability.

Additionally, the assessment fails to consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are situated within a broader landscape context, interlinked by visual and spatial relationships to the Atlantic horizon. The evaluation treats these sites in isolation rather than recognising their interdependence, leading to an incomplete assessment of impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the safeguarding of natural areas and historic assets. The anticipated scale of change is incompatible with the obligation to preserve landscape character, visual amenity, and the setting of culturally important sites. The lack of a thorough worst-case evaluation further weakens any assertion of compliance with policy.

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

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

FISHERIES AND MARINE LIFE

The application proposes development that raises significant concerns regarding its effects on fisheries and marine life. The waters off the West Lewis coast are known for both a diverse marine ecosystem and an active fishing industry, yet the proposal does not adequately demonstrate how these vital uses and habitats will be protected or maintained without causing substantial disruption.

A critical concern lies in the assumption that fishing activities can be displaced without any adverse effects. The application lacks evidence to confirm that alternative fishing

grounds are available, accessible, or capable of absorbing the additional pressure that would result from such displacement. This absence of information is important, as it risks potential overfishing in other areas and could have wider economic repercussions for the local fishing fleet. Without a robust and evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Furthermore, the proposal introduces significant 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 create disturbances over large areas, negatively affecting species like dolphins. The anticipated impact on a considerable portion of the local bottlenose dolphin population raises substantial concerns, yet the application downplays these effects without adequate supporting evidence.

The application exhibits a noticeable inconsistency where the need for licences to permit harm to European Protected Species is recognised, while simultaneously characterising those impacts as negligible. This contradiction undermines the credibility of the assessment and raises questions about its compliance with the Habitats Regulations, especially where harm is anticipated to a level that requires legal authorisation.

In addition, the assessment neglects to consider cumulative impacts resulting from multiple pressures such as habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential to understand the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the proposal does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, which prevents any determination that the proposal constitutes sustainable development.

Overall, the deficiencies related to evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment contribute to its incompleteness and unreliability. These shortcomings hinder a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is fundamentally inadequate, failing to consider the full range of impacts stemming from what constitutes a single integrated project. The offshore turbines and the onshore works are interconnected; however, they are assessed in isolation, leading to a fragmented analysis that masks the actual extent of environmental and socio-economic consequences.

Onshore elements encompass cabling that traverses protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access

infrastructure that runs through sensitive landscapes. This construction involves excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and an ecologically delicate habitat. The application lacks a thorough assessment of these impacts, which obstructs a comprehensive understanding of the project's total environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application fails to allow for a proper examination of cumulative effects. The Environmental Impact Assessment process stipulates that all components of a project must be assessed collectively; the division between offshore and onshore aspects results in an insufficient understanding of the combined impacts on peatlands, habitats, and local communities.

There are notable risks posed to sensitive habitats, including machair systems and peatland environments, both of which are subject to policy protection. The application does not sufficiently demonstrate that the impacts on these habitats have been fully evaluated or that appropriate avoidance strategies have been enacted. This absence highlights a significant evidential gap concerning biodiversity protection.

Concerns regarding carbon balance are also raised by the proposal. Disturbance of peatland can lead to the release of stored carbon, potentially generating a carbon debt that undermines the objectives of renewable energy initiatives. The application fails to adequately address this matter or to show that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land may lead to conflicts with existing land use and legal rights. The application provides no evidence that the requisite consents or processes have been started, which brings into question the project's deliverability and lawful execution.

From a policy standpoint, the lack of a holistic assessment of the project and the failure to demonstrate protection of peatlands, habitats, and land use interests contravene the National Marine Plan and the National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further diminishes the application's credibility.

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal represents a significant failure to meet the standards of sustainable development when evaluated against statutory requirements, national policy, and evidential benchmarks. This application mirrors the core issues that resulted in the denial of the Lewis Wind Power proposal in 2008, where

the unacceptable scale of industrialisation was highlighted. Presenting this proposal under a stronger policy framework, which emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, does not rectify its inherent flaws.

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

Procedural shortcomings are also evident. The failure to produce a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Moreover, the omission of the complete Social Impact Assessment represents a substantial gap in the information provided. These deficiencies prevent the competent authority from adequately assessing the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

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

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

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

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

Additional Comments

Should the project go ahead then I fear the changes to the island will cause irreversible damage.

As an islander I feel I have a duty to try to protect the island.

Not too long ago we experienced the HPMA saga, which now seems to be a distant memory as the Government looks to destroy the natural seabed with these huge structures.

The island's infrastructure is not built for the number of people or level of traffic that is rumoured to be coming to the island.

There only seems to be a short term benefit to the island financially while the work is carried out. For a project that is so dramatic to the island then there should be much longer term benefits.

The UK made a huge mistake by selling off oil in the 1980s and now we look set to destroy one of the most naturally beautiful areas in the UK, if not the world.

The Scottish and UK Governments are bending over backwards to meet renewable energy/Green targets while we are a mere speck of the global issue.

Let's not be the generation of islanders that future generations look back on with disgust and disappointment.

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: C98C3162

Member of the public 1984

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is incomplete and fails to provide a clear, reliable account of the potential environmental effects of the proposal. The absence of fixed turbine dimensions, layouts, or configurations due to the flexible Project Design Envelope creates significant uncertainty. This lack of commitment undermines the assessment's integrity and prevents both the public and the competent authority from grasping the actual extent of the environmental effects, as the impacts presented may not accurately reflect the development that will ultimately be constructed.

Moreover, the application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent with the understanding that environmental harm will be addressed later does not allow for a meaningful evaluation of effectiveness or the assessment of residual impacts. This deferral of critical information to post-consent stages is procedurally inappropriate and contradicts the Environmental Impact Assessment regime's purpose, which necessitates a clear establishment of likely significant effects and mitigation prior to determination.

Additionally, the report suffers from substantial evidential deficiencies, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These issues lead to uncertainty about 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 and introduces scientific uncertainty that does not 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 necessitates the application of the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it cannot be evidenced that impacts have been fully assessed or that appropriate safeguards are in place.

In conclusion, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and thorough assessment of environmental effects and mean that the competent authority cannot make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives presented within the application is insufficient and fails to comply with the statutory requirements of the Environmental Impact Assessment regime. It lacks a structured and reasoned comparison of viable alternatives based on their environmental effects, instead offering a narrative of project evolution. This narrative does not demonstrate that less harmful options have been properly identified,

assessed, and selected over more damaging solutions.

The absence of a transparent, evidence-based comparison regarding alternative offshore locations, development scales, or design configurations is evident. Specifically, there is no indication that the developer has adequately considered the potential benefits of situating turbines further offshore, which could potentially mitigate 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, the lack of such analysis precludes any conclusion that the proposed siting is the least damaging option.

These deficiencies are further apparent in the assessments of cable routing and landfall, where there is insufficient evidence to suggest that alternative routes have been properly explored to avoid or minimise impacts on sensitive receptors. Areas of cultural and spiritual importance, such as Barvas Cemetery, have not been sufficiently considered. The failure to implement a clear avoidance strategy and the lack of comparative analysis indicate that mitigation by design has not been pursued, resulting instead in a reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This represents a significant failure to adhere to the established mitigation hierarchy and limits the ability of the competent authority to ascertain whether less harmful and more suitable alternatives are available. In the absence of a thorough alternatives assessment, it cannot be concluded that the proposal is sustainable or compliant with policy.

From a policy standpoint, this deficiency also undermines adherence to National Planning Framework 4, particularly with regard to 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 undergone adequate assessment and cannot sustain a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed application presents significant shortcomings in its assessment of marine ecology and protected species in the West Lewis coastal environment. This area is known for its sensitivity and biological activity, yet the baseline data is insufficient. The methodologies used do not adequately account for the presence, behaviour, and habitat use of various species. Consequently, the assessment fails to offer a reliable basis for understanding the potential impacts.

A notable gap in the evaluation concerns otters, which are classified as a European Protected Species. The application does not adequately recognise their active use of coastal zones for foraging and movement. The assessment neglects to consider their core foraging range and behavioural patterns, which leads to an insufficient evaluation

of potential impacts from construction disturbance, noise, and increased human activity. This undermines claims about the absence of significant effects on otters.

Additionally, the assessment of basking sharks contains flaws. The reliance on aerial surveys introduces a risk of detection bias, especially under Atlantic conditions, which could result in an underestimation of their presence. This is particularly concerning when compared to established land-based observations that show frequent use of these waters. Ignoring or inadequately addressing this information further undermines the baseline data and weakens the conclusions drawn.

The methodological weaknesses mean that conclusions regarding negligible or non-significant effects rely on assumptions rather than solid evidence. The lack of adequate baseline data also hampers the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual risks to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the requirements set by the Environmental Impact Assessment regime and National Planning Framework 4, as there has been inadequate identification or assessment of protected species. The uncertainty generated prevents the exclusion of adverse effects beyond reasonable scientific doubt, invoking the precautionary principle. Therefore, consent cannot be lawfully granted under these conditions.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing decline. The ornithological assessment associated with the application is fundamentally flawed and exhibits considerable gaps in evidence and internal inconsistencies that detract from its conclusions. The application does not adequately demonstrate that these species will not be adversely affected, particularly given that the development is situated within key foraging areas and migratory pathways. There is a failure to robustly evaluate the implications of displacement, collision risk, or habitat loss.

A notable contradiction arises in the application, where the developer claims that there are no significant adverse effects while also presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts regarding the assessment's reliability and indicates that the conclusions presented lack adequate support from the underlying evidence.

Moreover, the assessment does not sufficiently prove that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The

significance of these feeding grounds is not thoroughly considered, and the reliance on modelling approaches contributes to uncertainty, especially for species like Kittiwakes and Fulmars that are in sharp decline. The methodologies employed are likely to underestimate mortality, particularly in situations where baseline data is incomplete and the behavioural responses of species are not fully understood.

The siting of turbines within a recognised migratory corridor adds another significant risk, as it effectively creates a barrier within a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of sustained mortality within this corridor or the potential impact on species that have relatively small global populations.

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

Overall, the identified deficiencies represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely impacted puts the proposal in direct contradiction to national policy. Collectively, these issues render the assessment unreliable due to internal inconsistencies, methodological weaknesses, and insufficient evidence, ultimately contributing to the conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

Significant concerns arise regarding culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These active places of burial and spiritual practice are mischaracterised as static features within the assessment, which neglects their continued use and the impact of development on their setting. This oversight leads to an incomplete evaluation of cultural effects and disregards the essential role these sites play in community life.

Moreover, the assessment omits consideration of intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These elements are vital to the area's identity but are

absent from the analysis, creating a significant gap in understanding the cultural impact of the development.

The rights and engagement of the community also raise further concerns. The Gaelic-speaking population possesses a distinct cultural identity characteristic of an Indigenous People. Yet, there has been no process of Free, Prior and Informed Consent, which undermines the legitimacy of the assessment and fails to honour established principles of participation in decisions affecting cultural and environmental interests.

Furthermore, a critical procedural failure is evident in the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. This omission precludes the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community, thus hindering lawful determination.

From a policy standpoint, these inadequacies place the proposal in direct conflict with National Planning Framework 4, especially concerning the protection of historic assets and places. The failure to account for both tangible and intangible heritage, and to recognise living cultural practices, constitutes a clear deviation from policy requirements.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment, which included focus groups with local residents. However, the full report has not been published, creating a significant evidential gap. This lack of transparency prevents both the public and the competent authority from understanding the extent of the social risks identified in the developer's research. Summaries indicate that residents are already feeling measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement, not speculation. Nonetheless, the failure to disclose the full assessment hinders proper scrutiny of these findings and limits the ability to assess their significance in the decision-making process.

The proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. However, these impacts have not been adequately integrated into the main application or given appropriate consideration. The withholding of the complete Social Impact Assessment obscures the true human and social cost of the development, undermining the Environmental Impact Assessment process. Understanding social, economic, and health impacts is crucial for developments of this scale, especially where community character and functioning may be affected. Without the full dataset, the application does not provide a

comprehensive basis for weighing the benefits against potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and avoid harm, yet available evidence shows existing adverse effects that have not been fully disclosed. Consequently, without the complete assessment, compliance with this policy cannot be established.

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

In summary, the non-disclosure of the complete Social Impact Assessment, alongside evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation prevents a lawful determination and supports the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of landscape, seascape, and visual impacts presented in the application is significantly inadequate, failing to capture the true scale of change and the sensitivity of the surrounding environment. The character of the West Lewis coastline is marked by its open Atlantic horizon and an undeveloped quality, which together contribute to a profound sense of remoteness. The proposed installation of large-scale turbines near the shoreline would introduce a pervasive industrial presence that would irreversibly transform this landscape, fundamentally altering its character.

Furthermore, the application does not sufficiently address the extent of visual change resulting from the turbines' scale and proximity. Their imposing nature would dominate the views from residential areas, historic sites, and popular coastal locations, detrimentally affecting visual amenity and diminishing the naturalness and remoteness that define the area. The assessment inadequately captures the significance of this impact within the context of such a sensitive landscape.

Concerns also arise from the methodology employed in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly regarding significant cultural heritage sites and valued landscapes. This leads to a potential underestimation of visual impacts, which in turn questions the reliability of the overall assessment.

Additionally, there is a critical oversight in evaluating the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integrated into a broader landscape context, interlinked visually and spatially with the Atlantic horizon. The assessment incorrectly treats these heritage assets as isolated, neglecting their interdependence and leading to an incomplete understanding of the impacts on their settings and cultural

importance.

The proposed industrialisation of the seascape would sever these crucial connections, altering how heritage assets are perceived and disrupting their ties to the natural horizon. This signifies not only a visual disturbance but also a deeper cultural and spatial detriment that has not been sufficiently addressed in the application.

From a policy standpoint, this proposal directly contravenes the National Planning Framework 4 concerning the preservation of natural spaces and historical assets. The magnitude of change associated with the proposal is incompatible with the obligation to protect landscape character, visual amenity, and the settings of sites of cultural significance. The lack of a thorough worst-case scenario analysis further compromises any assertion of compliance with policy.

It is evident that the impacts identified in the assessment cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelmingly dominant and unavoidable. The resulting alterations are fundamental and permanent, rather than manageable to an acceptable extent through mitigation strategies.

In conclusion, the assessment falls short of accurately portraying the scale of impact, the sensitivity of the environment, and the interlinked nature of landscape and heritage. These shortcomings hinder a dependable evaluation and strongly indicate that the proposal is at odds with the essential protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

This reliance on undefined future measures raises particular concern given the sensitivity of the receiving environment. The coastline of West Lewis supports clean coastal waters and important habitats that are vulnerable to disturbance and contamination from sediment. Although the application acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide sufficient details on how these risks will be prevented, controlled, or monitored.

Additionally, there is uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty extends to

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

The absence of detailed emergency response procedures further exacerbates these concerns. By postponing contingency planning to a post-consent stage, the application prevents the evaluation of whether appropriate safeguards are in place to respond to pollution events. This introduces procedural risks and undermines the ability of the competent authority to assess environmental protection measures during the determination process.

From a regulatory viewpoint, the deferral of critical environmental safeguards is in conflict with the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be assessed prior to consent, and without this information, a lawful determination cannot be reached. The application also fails to demonstrate compliance with policy requirements regarding environmental protection and water quality.

Overall, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty concerning potential impacts collectively render the assessment materially deficient. These shortcomings obstruct a robust evaluation of construction and pollution risks and support the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment presented in the application regarding fisheries and marine life is notably inadequate, lacking a thorough evaluation of the ecological and socio-economic impacts involved. The marine environment off the West Lewis coast is home to a rich array of marine species and supports a vibrant fishing industry. However, the application does not convincingly demonstrate how these vital uses and habitats can be safeguarded from significant disruption.

A critical concern is the assumption made that fishing activities can be displaced without resulting consequences. There is no substantiated evidence provided to suggest that alternative fishing grounds are available or accessible, nor that they could sustain the increased pressure from displaced fishing activities. This significant omission raises the potential for overfishing in other areas, which may yield broader economic repercussions for the local fishing fleet. Consequently, without a transparent and evidence-supported evaluation, the impacts on fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, particularly due to underwater noise generated during construction activities. The anticipated high-energy hammer piling over a prolonged period is likely to disturb marine life over considerable distances, including populations of dolphins. The expected disturbance to a considerable segment of the local bottlenose dolphin population prompts serious concern, yet the application minimizes the importance of these effects without

sufficient backing evidence.

In addition, there exists a clear inconsistency within the application where the necessity for licenses to permit harm to European Protected Species is recognised, whilst simultaneously asserting that the impacts are negligible. This contradiction calls into question the credibility of the assessment and raises significant concerns regarding adherence to the Habitats Regulations, especially where harm is projected to an extent that necessitates legal authorisation.

Furthermore, the assessment fails to adequately address the cumulative impacts resulting from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activity. In the absence of a comprehensive evaluation of these interconnected effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately assessed.

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

Ultimately, the lack of evidence concerning the displacement of fishing activities, the underestimation of acoustic impacts, and the internal inconsistencies of the application culminate in an assessment that is both incomplete and unreliable. These shortcomings obstruct a thorough evaluation of the implications for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents significant shortcomings in assessing the onshore infrastructure, resulting in a fragmented evaluation that overlooks the interconnected nature of the offshore turbines and onshore works. This separation obscures the full scale of environmental and socio-economic impacts stemming from what is fundamentally a single integrated project.

The onshore components involve crucial elements such as cabling traversing protected moorland, the construction of a substation in proximity to Stornoway, and related access infrastructure through sensitive landscapes. Importantly, excavation activities will occur in deep peat areas, notably within Barvas Moor, which serves as both a critical carbon store and an ecologically sensitive habitat. However, the application fails to offer a thorough assessment of these impacts, resulting in a lack of clarity regarding the project's overall environmental footprint.

Moreover, the exclusion or postponement of evaluating onshore impacts significantly hampers the ability to understand cumulative effects. The Environmental Impact Assessment process necessitates that all components of a project are examined collectively; yet, by treating offshore and onshore aspects separately, the application

fails to fully address the combined consequences on peatlands, local habitats, and surrounding communities.

There are considerable risks posed to sensitive habitats, including machair systems and peatland environments, which have policy protections in place. The application does not convincingly demonstrate that the effects on these habitats have been comprehensively assessed or that suitable avoidance measures are in place, highlighting a critical evidential gap in terms of biodiversity protection.

Additionally, concerns surrounding carbon balance arise from the potential release of stored carbon due to peatland disturbance, which could lead to a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently tackle this issue or confirm that the overall carbon balance remains positive.

The routing of infrastructure across active croft land further complicates matters, potentially conflicting with established land use and legal rights. The application lacks evidence to support that the necessary consents or processes have been initiated, casting doubt on the feasibility and lawful execution of the project.

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

In summary, the division of project components, the lack of thorough assessment, and insufficient evidence regarding environmental and land use impacts collectively render this aspect of the application incomplete and unreliable, ultimately obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to address the assessment of dark skies and nocturnal wildlife, which constitutes a material omission. The West Lewis coastline is known for its exceptionally dark skies, which are crucial to environmental quality, cultural identity, and tourism value. The proposed development includes the installation of permanent red aviation lighting that would be visible over long distances, resulting in a continuous and intrusive “wall of light” effect across the western horizon. This change would fundamentally alter the night-time environment.

Additionally, the application neglects to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly significant given the importance of dark skies to the area's identity and the burgeoning astro-tourism sector. The failure to consider these impacts creates a notable gap in the overall landscape and environmental assessment.

More alarmingly, there is no analysis of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application lacks any form of lighting impact assessment or phototaxis study, failing to explore how aviation lighting could affect these species or contribute to increased mortality.

This omission is further exacerbated by an overreliance on daytime survey data within the ornithological assessment, which does not account for nocturnal activity or related risks. For instance, Kittiwakes, which may forage or migrate at night, are susceptible to disorientation from artificial lighting, yet this risk has been ignored. The absence of site-specific night-time data presents a significant gap in the understanding of ecological impacts.

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

From a policy perspective, this omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. Furthermore, it diminishes the broader evaluation of landscape and seascape impacts, as the night-time character is a vital component of the environment.

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

TOURISM

The evaluation of tourism impacts within the application is significantly lacking, with a failure to assess the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application indicates that 86% of visitors are attracted by the scenery, it does not provide any quantified assessment regarding how the introduction of large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of this sector.

Tourism has seen substantial growth, rising from £65 million in 2017 to over £81.5 million currently, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application does not analyse how the industrialisation of the seascape and the degradation of environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the island. The lack of such an assessment means it is impossible to ascertain whether the proposed development

would yield a net economic benefit or threaten an established and expanding sector.

Moreover, the assessment neglects the crucial role that environmental quality plays in attracting tourists, particularly regarding the preservation of unspoiled landscapes and dark skies that enhance visitor experiences. This oversight is further exacerbated by the omission of a Dark Skies Assessment, resulting in a significant gap in understanding the implications for a recognised and burgeoning segment of the local economy, such as nature-based tourism and astro-tourism.

In the context of an island community characterised by limited economic diversification, the lack of a thorough assessment of tourism impacts bears broader consequences for employment, local businesses, and the sustainability of communities. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to demonstrate adherence to National Planning Framework 4, particularly concerning economic impacts and the need to show a 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 consequences of the proposal adequately.

Overall, the combined failure to quantify tourism impacts, assess the environmental drivers that influence visitor behaviour, and recognise the economic dependencies of the island culminates in a significant evidential gap. This deficiency 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 fundamentally fails to meet the criteria for sustainable development when evaluated against legal obligations, national policy, and evidence standards. This application mirrors the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was noted. It is presented now under a more robust policy framework that places additional emphasis on biodiversity, peatland protection, landscape integrity, and the wellbeing of the community.

There are significant gaps in the evidential basis for this application. It lacks comprehensive baseline data, utilises an ambiguous design envelope, depends on unspecified mitigation measures, and omits crucial impact pathways related to nocturnal wildlife, the full extent of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of likely significant effects or residual impacts.

Moreover, procedural deficiencies are evident. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands

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

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

There are unresolved environmental risks that remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion that impacts are acceptable.

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

In summary, the application is fundamentally unfit for determination both procedurally and substantively. The extensive information deficiencies, along with policy conflicts and unresolved environmental risks, preclude a lawful and evidence-based decision. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm application is refused entirely.

Additional Comments

We moved home and build our home on the west coast of Lewis. The main reason being the unspoilt view, clear skies, clean air. There is no way of knowing the impact these structures are going to have on our health, not to mention the health and habitat of the varied marine life in our local waters. With an island that is seeing declining numbers in our younger population this is a step in the wrong direction. It is clear that money is the only thing that matters in this and not the rare uniqueness of such a special part of the world. The damage will be irreparable.

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: 0A01318F

Member of the public 1985

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and its supporting documents, revealing significant deficiencies in planning, environmental considerations, cultural factors, and procedural compliance. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, largely unspoilt environment, and rich cultural heritage. The proposal raises serious concerns about its alignment with statutory obligations, national policies, and the principles of sustainable development.

The application lacks a robust evidential foundation necessary for a lawful decision. Essential environmental data is absent, baseline information is both limited and inconsistent, and various critical aspects of the proposal remain undefined. The reliance on a flexible design framework obscures an understanding of potential significant effects, while the dependence on unspecified mitigation measures makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a comprehensive or informed assessment of the environmental, cultural, or community implications, and the assertions of negligible or non-significant effects lack solid evidence.

There are evident and significant conflicts with established policies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and community health and wellbeing. It does not prove that it meets national standards for protecting biodiversity, climate interests, and environmental integrity. These policy inconsistencies directly impact the statutory tests required for consent and jeopardise the ability of the relevant authority to deem the development acceptable according to policy guidelines.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shoreline, raises substantial concerns regarding landscape capacity, visual dominance, and environmental repercussions. The lack of adequate information, the reliance on undefined mitigation strategies, evidential weaknesses, and evident non-compliance with policy collectively indicate that the application is deficient and does not support a lawful determination. In light of these factors, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, failing to deliver a comprehensive, transparent, or dependable evaluation of the environmental repercussions of the proposal. There exists considerable uncertainty due to the employment of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations of turbines. This lack of commitment compromises the integrity of the assessment, leaving both the public and the competent authority unable to grasp the true extent of potential environmental effects.

Key information regarding mitigation measures, monitoring strategies, and management plans remains undefined, leading to a situation where consent is sought under the premise that any environmental harm will be rectified at a later stage. Such a deferral not only obstructs a meaningful assessment of effectiveness but also contravenes the principles of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies must be clearly established prior to determination.

In addition, the application displays substantial evidential deficiencies, such as gaps in baseline data and limitations in methodology. Reliance on assumptions rather than site-specific evidence exacerbates uncertainty concerning the scale and significance of impacts. This is particularly evident when negligible or non-significant effects are concluded without adequate supporting data. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to align with statutory requirements.

Due to these shortcomings, the application does not meet the necessary evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate alignment with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it is unable to show that impacts have been thoroughly evaluated or that appropriate 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 unreliable and incomplete. These serious deficiencies prevent a lawful and robust evaluation of environmental effects, ultimately leaving the competent authority incapable of making an informed decision based on the information submitted.

ASSESSMENT OF ALTERNATIVES

The application presents a narrative account of project evolution rather than a structured, evidence-based comparison of alternatives. This lack of analysis is a significant shortcoming, as it does not demonstrate that less harmful options have been identified and assessed in preference to more damaging solutions. Specifically, there is an absence of a transparent comparison of offshore locations, development scales, and design configurations. The developer has not adequately considered the

possibility of placing turbines further offshore, where impacts on visual aspects, ecology, and the coast would likely be mitigated. This is particularly crucial given the sensitivity of the West Lewis coastline and the importance of proximity to shore in determining environmental impacts.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species within the West Lewis coastal environment presents significant deficiencies. This area is known for its sensitivity and biological activity, yet the available baseline data is incomplete. The methodologies employed do not effectively capture the presence, behaviour, or habitat use of various species, resulting in a lack of sound evidential basis for assessing impacts.

A critical shortcoming is evident in the assessment of otters, which are classified as a European Protected Species. The application inadequately recognises and evaluates their active utilisation of coastal regions for foraging and movement. This oversight means that the assessment does not account for their core foraging range and behavioural patterns, leaving the potential effects of construction disturbance, noise, and increased activity unassessed. Consequently, any conclusions drawn about the lack of significant effects on this species are fundamentally undermined.

Further shortcomings are found in the evaluation of basking sharks. The reliance on aerial surveys introduces significant detection bias, particularly under Atlantic conditions, which may lead to an underestimation of their presence. This is particularly concerning when compared to established land-based observations that indicate frequent usage of these waters. The failure to incorporate or appropriately consider such data results in an incomplete baseline and diminishes the reliability of the presented conclusions.

These methodological weaknesses imply that the conclusions regarding negligible or non-significant effects are based more on assumptions than on robust evidence. Moreover, the absence of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This leaves uncertainty about the actual scale of risk to marine species and habitats.

From a regulatory standpoint, the application fails to satisfy the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it does not adequately identify or assess protected species. The uncertainty created through these omissions means that adverse effects cannot be excluded beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these considerations, it is clear that consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions leads to an unreliable assessment. These significant deficiencies preclude a robust evaluation of impacts on marine ecology and protected species, thereby indicating that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment presented in the application raises significant concerns regarding its reliability and thoroughness, primarily due to internal inconsistencies and substantial evidence gaps. It is critical to note that the west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing declines. The application fails to sufficiently demonstrate, to the necessary evidential standard, that these species will not face adverse impacts. Key foraging areas and migratory pathways, which are crucial for these birds, are affected by the proposed development. However, the assessment does not adequately address the implications of potential displacement, collision risks, or habitat loss.

A notable contradiction is evident within the application itself, as the developer asserts that there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is typically needed when significant harm is anticipated. This contradiction casts doubt on the reliability of the assessment and indicates that its conclusions are not underpinned by solid evidence. The assessment lacks adequate evidence regarding the impact on seabirds linked to protected sites such as the Lewis Peatlands and St Kilda. The critical nature of these feeding grounds is insufficiently acknowledged, and the use of modelling approaches introduces further uncertainty, particularly for species experiencing severe declines, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly in the context of incomplete baseline data and incomplete understanding of species' behavioural responses.

The positioning of turbines within an acknowledged migratory corridor poses additional significant risks, as it effectively creates a barrier along a primary flight route for species

migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor have not been adequately assessed, nor have the potential effects on species with relatively small global populations.

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

Moreover, the deficiencies identified signify non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected places the proposal in direct conflict with national policy.

In conclusion, the overall assessment is rendered unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These deficiencies hinder a thorough evaluation of the potential impacts, leading to the overarching conclusion that the application does not meet the statutory requirements necessary 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 developer has commissioned a Social Impact Assessment that includes focus groups with local residents; however, the full report has not been published. This represents a significant evidential gap, which hinders both public understanding and the competent authority's ability to assess the full extent of the social risks identified through the developer's research. Available summaries suggest that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, highlighting the immediate social impacts that have emerged from direct community engagement.

Furthermore, there is a notable perception among residents that the proposal threatens community identity and cohesion, with evidence of "cultural loss" identified in the developer's findings. Unfortunately, these findings have not been adequately integrated into the main application or given the appropriate consideration. The decision to withhold the full Social Impact Assessment obscures the true human and social costs associated with the development, which is essential for informed decision-making.

This lack of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when the character and functioning of the community may be at stake. Without the complete dataset, the application fails to provide a thorough evidential basis for assessing the balance between potential benefits and the associated harms.

From a policy standpoint, the application does not demonstrate compliance with

National Planning Framework 4 concerning health and wellbeing. It is essential that development supports positive health outcomes and mitigates harm; however, the evidence available indicates the presence of existing adverse effects that have not been fully disclosed. Thus, without the complete assessment, it cannot be established that the application meets this policy requirement.

The procedural implications of this situation are significant. The competent authority is unable to conduct a robust socio-economic and health evaluation in the absence of the full Social Impact Assessment, which constitutes a material omission within the application and a failure to meet the evidential standards of the Environmental Impact Assessment regime. Collectively, the non-disclosure of the full Social Impact Assessment, coupled with the evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This ultimately prevents a lawful determination and underscores the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts and the relationship between landscape, seascape, and cultural heritage is fundamentally flawed, failing to adequately capture the scale of change and the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines, situated near the shoreline, would create an overwhelming industrial presence, fundamentally altering this character and leading to a permanent transformation of the landscape.

Moreover, the application does not sufficiently address the extent of the visual change. The size and closeness of the turbines would dominate views from nearby residential areas, historic sites, and popular coastal locations, thereby directly impacting visual amenity and diminishing the qualities of naturalness and remoteness. The assessment inadequately communicates the significance of this impact within the context of such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully reflect the most sensitive receptors or the worst-case scenarios, particularly concerning important cultural heritage sites and high-value landscapes. This oversight raises the possibility that the visual impacts have been underestimated, casting doubt on the reliability of the assessment.

Additionally, there is a notable failure to consider the interconnectedness of landscape, seascape, and cultural heritage. Key sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape linked by visual and spatial relationships to the Atlantic horizon. Instead of recognising their interdependence, the assessment treats these sites as isolated entities, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their connection to the natural horizon. This constitutes not just a visual impact but a wider cultural and spatial harm that remains inadequately assessed in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, particularly concerning the preservation of natural places and historic assets. The scale of transformation is inconsistent with the necessity to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further diminishes any assertion of policy compliance.

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

In summary, the assessment fails to accurately depict the extent of the impacts, 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 provided regarding construction and pollution risks is notably deficient, lacking the essential detail needed to properly evaluate potential environmental impacts. The project entails significant seabed preparation and installation activities within a dynamic Atlantic environment, yet it does not include comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that will only be developed after consent, which hampers any meaningful assessment of their adequacy or effectiveness.

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

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

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

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

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

FISHERIES AND MARINE LIFE

The application 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 evaluation of the onshore infrastructure is fundamentally lacking and does not take into account the full range of impacts from what constitutes a single integrated project. The offshore turbines are closely linked to the onshore works, yet they are assessed separately, leading to a disjointed approach that masks the true extent of environmental and socio-economic consequences.

The onshore components comprise cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure through sensitive landscapes. Excavation in areas of deep peat, especially within Barvas Moor, poses risks to a significant carbon store and ecologically sensitive habitat. The application falls short by failing to provide a detailed assessment of these impacts, which obstructs a full understanding of the project's overall environmental footprint.

By excluding or delaying the evaluation of onshore impacts, the application inhibits a proper assessment of cumulative effects. The Environmental Impact Assessment process requires that all aspects of a project be considered collectively. However, the disconnection between offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities remain unclear.

There are considerable risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not show that impacts on these habitats have been adequately assessed or that suitable

avoidance measures have been implemented. This results in a significant evidential gap regarding biodiversity protection.

Concerns also arise regarding the carbon balance. Disturbance of peatland can release stored carbon, potentially creating a carbon debt that runs counter to renewable energy development goals. The application fails to address this issue sufficiently or prove that the overall carbon balance is advantageous.

Furthermore, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is no evidence that the necessary consents or processes have been started, leading to doubts about the feasibility and lawful execution of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife is a significant oversight within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the region's environmental quality, cultural identity, and tourism value. The proposed installation of permanent red aviation lighting, which will be visible over long distances, would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

Moreover, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This omission is particularly concerning given the importance of dark skies to the area's identity and the potential growth of tourism sectors such as astro-tourism. The lack of consideration for these impacts leads to a clear deficiency in the overall landscape and environmental assessment.

The absence of an evaluation regarding the effects of artificial lighting on nocturnal wildlife raises further concerns. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial light due to phototaxis, which can cause disorientation and increase the risk of collisions. The application does not incorporate any assessment of lighting impacts or conduct a phototaxis study, thus failing to determine how aviation lighting may affect these species or contribute to increased mortality rates.

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

Without an assessment of nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites would face adverse impacts. The necessary evidential standard to rule out adverse effects beyond reasonable scientific doubt cannot be achieved, which invokes the precautionary principle and obstructs a lawful determination.

From a policy perspective, this omission contradicts the National Planning Framework 4's focus on safeguarding natural places and maintaining environmental quality. It also diminishes the broader evaluation of landscape and seascape impacts, as the character of night-time is an essential aspect of the environment.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements for sustainable development according to statutory duties, national policy, and evidential standards. It echoes the issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application lacks a comprehensive evidential basis for decision-making.

There are significant gaps in the baseline data, an undefined design envelope is used, unspecified mitigation measures are relied upon, and crucial impact pathways are omitted. These include considerations for nocturnal wildlife, complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate and fails 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 statutory duties outlined in the Islands (Scotland) Act 2018. Furthermore, the failure to present a complete Social Impact Assessment represents a serious omission. Such deficiencies hinder the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal contradicts National Planning Framework 4, as it does not sufficiently demonstrate protection of biodiversity, natural places, and cultural heritage. It fails to indicate acceptable health and wellbeing impacts and cannot prove a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been adequately evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments relating to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, thereby invoking the precautionary principle and barring a lawful conclusion about the acceptability of impacts.

Additionally, the proposal would cause substantial and irreversible changes to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and the impacts on tourism represent lasting effects that cannot be adequately mitigated.

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 4FA91540

Member of the public 1986

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a detailed review of the Environmental Impact Assessment Report and associated documentation, revealing several critical deficiencies related to planning, environmental considerations, cultural heritage, and procedural integrity. The site is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and significant cultural identity. The scope, design, and scale of the proposed development give rise to serious concerns regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application is fundamentally flawed due to the absence of a robust evidential basis necessary for a lawful determination. Essential environmental data is lacking, while the baseline information provided is both limited and inconsistent, leaving key elements of the proposal undefined. The employment of a flexible design framework hampers a clear assessment of likely significant effects, and the reliance on unspecified mitigation measures precludes any evaluation of their effectiveness. Consequently, the documentation does not furnish a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsubstantiated by adequate evidence.

Moreover, there exist clear and substantive conflicts with existing policies. The proposal shows inconsistencies with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. These policy conflicts directly relate to the statutory tests required for consent and compromise the competent authority's ability to deem the development acceptable from a policy perspective.

In addition, the unprecedented scale of the proposal poses significant challenges, with large turbines located in close proximity to the shoreline, which raises profound concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation measures, evidential shortcomings, and pronounced non-compliance with policy clearly indicate that the application is incomplete and insufficient to support a lawful determination. Under these circumstances, it is imperative that the precautionary principle be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate, failing to deliver a complete and transparent account of the potential environmental effects associated with the proposal. The flexibility of the Project Design Envelope, lacking a commitment to specific turbine dimensions or configurations, introduces considerable uncertainty and undermines the possibility of applying a worst-case scenario consistently. This deficiency compromises the integrity of the assessment, obscuring the true environmental impacts and hindering both public understanding and the competent authority's ability to grasp the actual extent of effects.

The application's heavy reliance on undefined mitigation measures, monitoring strategies, and management plans, which remain unspecified, is concerning. Consent is sought with the premise that any environmental harm will be mitigated later, thus obstructing a meaningful evaluation of their effectiveness and any assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contravenes the objectives of the Environmental Impact Assessment regime, which necessitates the clear establishment of likely significant effects and mitigation prior to decision-making.

Additionally, there are considerable evidential gaps, including deficiencies in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. Such shortcomings create uncertainty regarding the magnitude and significance of impacts, particularly when conclusions suggesting negligible or non-significant effects lack robust supporting data. The insufficient information leads to a failure to understand cumulative and worst-case impacts, introducing a level of scientific uncertainty that contradicts 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 scenario invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, particularly in relation to biodiversity protection and environmental integrity, as it fails to provide assurance that impacts have been comprehensively assessed or that adequate safeguards are in place.

In summary, the combination of an ill-defined design envelope, the absence of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These critical deficiencies inhibit a lawful and robust evaluation of environmental effects, leaving the competent authority ill-equipped to make a determination based on the information submitted.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species presents significant deficiencies that compromise the understanding of ecological receptors in the West Lewis coastal environment. This area is known for its sensitivity and biological activity,

yet the baseline data provided is incomplete. The methodologies employed fail to adequately document species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A notable shortcoming is the treatment of otters, a European Protected Species. The application does not sufficiently recognise or assess their active use of coastal regions for foraging and movement. The disregard for their core foraging range and behavioural patterns means that the potential effects from construction disturbance, noise, and increased activity have not been properly evaluated. This oversight undermines any assertions regarding the absence of significant effects on this species.

Further concerns arise regarding basking sharks, as the reliance on aerial surveys is prone to significant detection bias, particularly in Atlantic conditions. This method is likely to underestimate their presence, especially when contrasted with established land-based observations that indicate regular use of these waters. The failure to incorporate or adequately consider such data results in an incomplete baseline, diminishing the reliability of the conclusions drawn.

These methodological flaws mean that conclusions of negligible or non-significant effects are based on assumptions rather than sound evidence. The lack of comprehensive baseline data hinders meaningful assessments of cumulative and indirect impacts, which encompass seasonal variations and broader ecosystem interactions. This situation generates uncertainty about the actual risks to marine species and habitats.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal critically underestimates the assessment of cultural heritage and community identity, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. It adopts a simplistic approach, viewing heritage merely as isolated, static assets rather than acknowledging their ongoing social, cultural, and spiritual relevance within the community.

Particularly troubling is the inadequate treatment of significant cultural sites, such as

the cemeteries at Dalmore, Bragar, and Barvas. These are not just static features; they are vital spaces for burial and spiritual practice. However, the assessment neglects to consider their continued use and meaning, as well as the development's potential impact on their surrounding environment. This failure leads to an incomplete understanding of cultural effects and dismisses their importance to community life.

Moreover, the application overlooks intangible cultural heritage, including the Gaelic language, various traditions, and the enduring relationship between the community and the coastal environment. These elements are integral to the area's identity and are entirely omitted from the assessment, representing a critical gap. Without accounting for these factors, the cultural ramifications of the development remain inadequately explored.

Concerns also arise around community rights and the necessity for engagement. The Gaelic-speaking population embodies a unique cultural identity with recognised traits of an Indigenous People, yet no process of Free, Prior and Informed Consent has been conducted. This lack of genuine engagement diminishes the credibility of the assessment and fails to adhere to established principles regarding participation in decisions that affect cultural and environmental matters.

Additionally, the absence of a compliant Island Communities Impact Assessment is a major procedural shortcoming, as mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission in itself precludes a lawful determination.

From a policy standpoint, these shortcomings place the proposal at odds with the National Planning Framework 4, especially concerning the safeguarding of historic assets and locations. The neglect to address both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, signifies a blatant disregard for policy requirements.

In summary, the neglect to evaluate living heritage, intangible cultural value, community rights, and statutory responsibilities results in a substantial evidential gap. The cultural impacts of the development have not been thoroughly assessed, and the application fails to deliver a solid foundation for understanding the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the full Social Impact Assessment represents a significant evidential gap that undermines the entire evaluation process for this development. While the developer engaged local residents through focus groups, the lack of transparency concerning the findings prevents both the public and the competent authority from fully understanding the social risks identified in the developer's own research. Existing summaries indicate that residents are already feeling measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These

impacts arise from direct engagement with the community and should not be dismissed as speculative; however, without access to the complete assessment, the findings cannot be properly scrutinised, limiting their significance in the decision-making process.

Furthermore, there is a perception among residents that the proposal poses a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this critical insight, these impacts have not been adequately integrated into the main application or given the necessary consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development, preventing a comprehensive understanding of its implications.

This lack of transparency also compromises the Environmental Impact Assessment process. An accurate assessment of social, economic, and health impacts is crucial for developments of this scale, especially when community character and functioning may be affected. Without the complete dataset, the application fails to provide a thorough evidential basis for evaluating the balance between benefits and harm. From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4 regarding health and wellbeing. Development should support positive health outcomes and avoid harm; however, the available evidence suggests existing adverse effects that have not been fully disclosed. Consequently, compliance with this policy cannot be established in the absence of the full assessment.

The procedural implications of this situation are serious. The competent authority cannot conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment, representing a material omission within the application. This failure to meet the evidential requirements of the Environmental Impact Assessment regime is concerning. Ultimately, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the evaluation incomplete and unreliable, hindering lawful determination and highlighting that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a significant sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline poses a risk of creating a continuous and dominant industrial presence, which would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

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

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

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

mitigation and contingency measures that would be formulated after consent, which hinders any meaningful assessment of their adequacy or effectiveness.

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

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

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

Overall, the lack of defined mitigation measures, insufficient management plans, and uncertainties regarding potential impacts render the assessment materially deficient. These issues prevent a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed assessment of onshore infrastructure is fundamentally incomplete and neglects the comprehensive impacts associated with what is fundamentally one integrated project. The offshore turbines and onshore works are closely interconnected, yet they have been evaluated separately, leading to a fragmented understanding that obscures the overall environmental and socio-economic repercussions.

Included within the onshore components are the cabling that will traverse protected moorland, the construction of a substation in the vicinity of Stornoway, and the associated access infrastructure that cuts through sensitive landscapes. These activities necessitate excavation in areas of deep peat, especially within Barvas Moor, an important carbon sink and ecologically significant habitat. The application lacks a thorough assessment of these impacts, inhibiting a complete understanding of the project's overall environmental footprint.

The exclusion or postponement of onshore impact assessments hampers the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all parts of a project be considered in unison, yet the disaggregation of offshore and onshore components means that the total impacts on peatlands, habitats, and local communities remain poorly understood.

There are notable risks to vulnerable habitats, including machair systems and peatland environments, which are protected under existing policy. The application falls short of demonstrating that impacts on these sensitive areas have been fully assessed or that suitable avoidance measures have been implemented. This results in a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. Disturbance of peatland can release stored carbon, potentially creating a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently tackle this concern or show that the overall carbon balance remains advantageous.

Furthermore, routing infrastructure through active croft land poses potential conflicts with established land use and legal rights. The application fails to provide evidence that necessary consents or processes have been undertaken, leading to doubts about the project's feasibility and legal compliance.

From a policy standpoint, the failure to evaluate the project in its entirety and to ensure the protection of peatlands, habitats, and land use interests contradicts the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated significantly undermines the application.

In summary, the division of project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts render this portion of the application deficient and untrustworthy, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment of dark skies and nocturnal wildlife is a significant oversight within the Environmental Impact Assessment. The coastline of West Lewis is noted for its exceptionally dark skies, which contribute to environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that will be visible over long distances, leading to a continuous and intrusive “wall of light” effect across the western horizon. This change fundamentally impacts the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly important given the role of dark skies in the area’s identity and the growing sector of astro-tourism. The lack of consideration for these impacts creates a significant gap in the overall landscape and environmental assessment.

Moreover, there is no analysis of the effects on nocturnal wildlife, including species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, all of which are highly sensitive to artificial lighting due to their phototactic behaviour, leading to disorientation and a higher risk of collision. The application does not feature any lighting impact assessment or phototaxis study, which means it cannot evaluate how the aviation lighting may affect these species or increase mortality rates.

Compounding this issue is the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activities or associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this danger has not been evaluated. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposed development.

Without an assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard required to rule out negative effects beyond reasonable scientific doubt cannot be satisfied, thus engaging the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4 regarding the protection of natural areas and environmental quality. Additionally, it undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is a crucial aspect of the overall environment.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights a significant failure to meet the standards of sustainable development when evaluated against statutory duties, national policy, and evidential criteria. This application mirrors the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Now, it is presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A reliable evidential foundation for determination is lacking in this application. There are notable deficiencies in baseline data, the use of an undefined design envelope, dependence on unspecified mitigation measures, and the exclusion of crucial impact pathways, including those related to nocturnal wildlife, onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects or residual impacts.

Furthermore, procedural failures are evident. The lack of a compliant Island Communities Impact Assessment contravenes the statutory obligations under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment represents a substantial omission. These shortcomings obstruct the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

This proposal contradicts National Planning Framework 4, as it fails to protect biodiversity, natural environments, and cultural heritage, does not demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately evaluated, masking potential repercussions for peatlands, carbon balance, habitats, and crofting land.

There are uncertainties and potentially significant risks to the environment. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are both incomplete and, in certain instances, inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: BC4BC534

Member of the public 1987

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 insufficient and fails to deliver a comprehensive, transparent, or reliable overview of the anticipated environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, lacking definitive commitments to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This uncertainty hampers a consistent application of a worst-case scenario, thereby compromising the integrity of the assessment. As a result, the projected impacts may not accurately represent the development that will ultimately be constructed, which prevents both the public and the competent authority from grasping the true scale of environmental effects.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. As such, consent is sought with the understanding that any environmental harm will be addressed subsequently. This approach obstructs a meaningful evaluation of the effectiveness of these measures and an assessment of residual impacts. Deferring key information to post-consent stages is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment regime, which mandates that likely significant effects and their mitigation be clearly established before any determination is made.

Moreover, there are notable evidential deficiencies, such as gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, especially where findings of negligible or non-significant effects are offered without robust supporting data. The lack of adequate information inhibits a clear comprehension of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

Consequently, the application does not fulfil the evidential threshold mandated by the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate alignment with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it is not evidenced that impacts have been fully assessed or that suitable safeguards are established.

In summary, the reliance on an unspecified design envelope, the absence of defined mitigation measures, and the existing gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These inadequacies hinder a lawful and robust evaluation of environmental effects and leave the competent authority unable to make an informed decision based on the information presented.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are in decline. However, the ornithological assessment

associated with the application is significantly flawed, presenting serious gaps in evidence and internal contradictions that undermine its findings. The development is sited within crucial foraging areas and migratory pathways, yet the assessment fails to adequately evaluate the risks of displacement, collision, or habitat loss for these species.

The application presents a fundamental contradiction, stating that there are no significant adverse effects while simultaneously making 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 its conclusions lack proper support from the available evidence. Furthermore, the assessment does not convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It inadequately considers the significance of these feeding grounds and relies on modelling approaches that introduce uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially where baseline data is lacking and behavioural responses remain poorly understood.

Moreover, the placement of turbines within a recognised migratory corridor poses an additional and serious risk, effectively obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of ongoing mortality in this corridor, along with potential impacts on species with limited global populations, are not sufficiently assessed in the application.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to ascertain that there will be no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data deficiencies, and modelling constraints indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle, thereby precluding a lawful conclusion in support of consent. The identified deficiencies also demonstrate non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to prove that internationally important seabird populations will not face adverse effects places the proposal in direct opposition to national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is seriously lacking. It does not acknowledge the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are closely interconnected. Instead, the application simplifies heritage, viewing it as a collection of isolated, unchanging

assets. This perspective ignores the ongoing social, cultural, and spiritual functions these elements have within the community.

A significant shortcoming is the handling of culturally significant sites like the cemeteries at Dalmore, Bragar, and Barvas. These places are active sites of burial and spiritual practice; however, the assessment wrongly categorises them as static features. It fails to take into account their continued use and the impact of development on their surroundings. Such mischaracterisation leads to an incomplete understanding of cultural effects and neglects their importance to community life.

Moreover, intangible cultural heritage is overlooked. Elements such as the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment are vital to the area's identity yet are entirely absent from the assessment. This gap means the cultural impact of the proposed development cannot be fully understood.

Community rights and engagement also raise concerns. The Gaelic-speaking population embodies a distinct cultural identity with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's validity and disregards established principles of participation in decisions affecting cultural and environmental interests.

Furthermore, there is a critical procedural failure, as a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018, has not been conducted. Without this assessment, the competent authority cannot legally evaluate the social, cultural, and economic impacts on the island community. This omission alone renders any determination of the proposal unlawful.

From a policy standpoint, these failures conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect to consider both tangible and intangible heritage and to recognise living cultural practices marks a clear deviation from policy requirements.

When viewed collectively, the shortcomings in assessing living heritage, intangible cultural value, community rights, and statutory obligations create a substantial evidential gap. The cultural impacts of the development remain unassessed, and the application does not offer a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

developer's own research.

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

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

presence that would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

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

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

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

This reliance on unspecified future measures raises serious concerns due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are particularly susceptible to sediment disturbance and contamination. Although the application acknowledges 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 ambiguity regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also extends to potential effects on marine species and habitats identified as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application undermines the ability to assess whether appropriate safeguards are in place for addressing pollution events. This introduces procedural risks and weakens the competent authority's capacity to evaluate environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed before consent, and the absence of this information means a lawful determination cannot be reached. Additionally, the application does not adequately demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of clearly defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts render the assessment materially deficient. These shortcomings prevent a comprehensive evaluation of construction and pollution risks and further support the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry, yet the application does not adequately protect these vital resources from significant disruption. A critical concern is the presumption that fishing

activities can simply be moved without repercussions. The proposal lacks evidence regarding the availability and accessibility of alternative fishing grounds capable of absorbing the additional pressure, which raises serious concerns about the potential for overfishing in other areas and the broader economic implications for the local fishing fleet. Without a thorough assessment grounded in evidence, the effects on local fisheries and livelihoods cannot be fully understood.

Moreover, there are considerable risks posed to marine species, particularly due to the underwater noise resulting from construction activities. The use of high-energy hammer piling over extended periods is expected to disturb marine life across significant distances, notably impacting species such as dolphins. The anticipated disturbance to a large portion of the local bottlenose dolphin population is alarming, yet the application significantly downplays these effects without adequate supporting evidence.

The application reveals an inconsistency by acknowledging the necessity for licences to permit harm to European Protected Species while simultaneously asserting that such impacts are negligible. This contradiction undermines the assessment's credibility and raises concerns about compliance with the Habitats Regulations, especially when harm is anticipated to a level that necessitates legal authorisation.

Additionally, the assessment neglects to address cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive review of these combined effects, it is impossible to gauge the overall implications for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 and the National Marine Plan. It does not illustrate how the proposed development can coexist with existing marine users or avoid adverse effects on marine biodiversity, which precludes any assertion that the proposal aligns with the principles of sustainable development.

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

TOURISM

The evaluation of the tourism impacts within the application is lacking and does not adequately address the economic and social ramifications for an essential sector of the Isle of Lewis. The area's wild coastline, near-pristine landscapes, dark skies, and remoteness are fundamental to tourism, which has seen a notable rise, growing from £65 million in 2017 to over £81.5 million. This growth has facilitated the creation of more than 1,000 jobs, constituting up to 16% of the island's economy. Despite these figures, there is no analysis presented on how large-scale offshore infrastructure could

influence visitor numbers, behaviours, or overall economic contributions.

The application also neglects to consider the significance of environmental quality, which is vital for tourism, particularly regarding unspoiled landscapes and dark skies that enhance visitor experiences and attract emerging markets such as nature-based and astro-tourism. The lack of a Dark Skies Assessment further highlights this shortcoming, resulting in a considerable gap in understanding the impacts on a growing segment of the local economy.

In an island community where economic diversification is limited, the failure to assess tourism impacts carries broader implications for employment, local businesses, and the sustainability of the community. The omission of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been thoroughly evaluated, as mandated by the Islands (Scotland) Act 2018.

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

In summary, the absence of a thorough quantification of tourism impacts, a disregard for the environmental drivers influencing visitor behaviour, and a lack of consideration for the island's economic dependency lead to a significant evidential gap. This gap hinders a thorough evaluation of economic effects and supports the assertion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm represents a fundamental failure to fulfil the requirements of sustainable development when evaluated against statutory duties, national policy, and evidential standards. This proposal reflects the same core issues that led to the rejection of the Lewis Wind Power proposal in 2008, specifically the unacceptable scale of industrialisation. Despite being submitted under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not provide a complete or reliable evidential basis for determination.

Critical gaps in baseline data exist, compounded by the continued use of an undefined design envelope and reliance on unspecified mitigation measures. Additionally, key impact pathways, including those concerning nocturnal wildlife, full onshore infrastructure, and tourism effects, have been omitted. Consequently, the Environmental Impact Assessment remains incomplete, hindering a full understanding of likely significant effects or residual impacts.

There are evident procedural failures, including the lack of a compliant Island Communities Impact Assessment, which violates statutory duties under the Islands

(Scotland) Act 2018. Furthermore, the failure to disclose the complete Social Impact Assessment constitutes a significant omission. These shortcomings inhibit the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal conflicts directly with National Planning Framework 4, failing to demonstrate protection of biodiversity, natural places, and cultural heritage. It does not show that health and wellbeing impacts are acceptable, nor can it provide evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impact of both offshore and onshore components has not been sufficiently assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant, with assessments concerning marine ecology, seabirds, protected species, and marine mammals being incomplete and inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been met. This engages the precautionary principle and precludes a lawful conclusion that impacts are acceptable.

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

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

It is therefore requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

UK government disregarding the impact these turbines will have on our communities. The government does not give a damn about us as long as they get what they want all for the bloody English.

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: 083F5025

Member of the public 1988

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the applicable marine licensing and Environmental Impact Assessment frameworks. The objection arises from an examination of the Environmental Impact Assessment Report and its associated documents, revealing significant deficiencies related to planning, environmental impact, cultural considerations, and procedural aspects. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural heritage. Concerns have been raised regarding the proposal's compatibility with statutory requirements, national policies, and the principles of sustainable development due to its scale, proximity, and design.

A crucial issue is the inadequate evidential basis provided for a lawful assessment of the application. There are notable gaps in critical environmental data, while baseline information is both limited and inconsistent. Furthermore, important elements of the proposal remain undefined. The application employs a flexible design framework that hinders a clear comprehension of the potential significant effects, and it relies on unspecified mitigation measures, which precludes an evaluation of their effectiveness. Consequently, the documentation does not furnish a full or informed understanding of the impacts on environmental, cultural, or community aspects, and assertions of negligible or non-significant effects lack robust evidence.

Moreover, the application presents clear and significant conflicts with established policy. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. The proposal does not sufficiently demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to determine whether the development is acceptable in policy terms.

The unprecedented scale of the proposal in this region, with large turbines positioned near the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and incapable of sustaining a lawful determination. Under these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and fails to deliver a complete, transparent, or reliable assessment of the potential environmental effects stemming from the proposal. A flexible Project Design Envelope is employed without any commitment to specific dimensions, layouts, or configurations of turbines, leading to significant uncertainty. This uncertainty hampers the application of a worst-case scenario and compromises the integrity of the assessment. Consequently, the impacts outlined may not accurately reflect the actual development, leaving both the public and the competent authority in the dark regarding the true environmental effects.

Additionally, the application depends extensively on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that environmental harm will be mitigated at a later stage precludes any meaningful evaluation of effectiveness or assessment of residual impacts. This approach to deferring essential information until post-consent stages is procedurally unacceptable and contravenes the core objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly established prior to the determination of the application.

Moreover, there are considerable evidential deficiencies, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty surrounding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are presented without substantial supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not meet the evidential threshold mandated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. The precautionary principle becomes relevant here, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, including obligations pertaining to biodiversity protection and environmental integrity, as it cannot be established that impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the combination of reliance on an unspecified design envelope, the lack of defined mitigation measures, and gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings impede a lawful and thorough evaluation of environmental effects, placing the competent authority in a position where it cannot justifiably determine the application based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application has not provided a structured and reasoned comparison of realistic alternatives based on environmental effects, which is a significant shortcoming.

Instead, it presents a narrative account of project evolution that fails to show that less harmful options have been properly identified, assessed, and chosen over more damaging solutions. There is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not illustrate that the developer has seriously considered placing turbines further offshore, where the visual, ecological, and coastal impacts would likely be diminished. The sensitivity of the West Lewis coastline highlights the critical importance of proximity to shore in determining impact, and the absence of such analysis raises questions about whether the proposed siting is the least damaging option.

The deficiencies also extend to cable routing and landfall assessment, as there is inadequate evidence that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis suggest that the design has not been mitigated by proper planning, relying instead on post-design mitigation measures.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development raises significant concerns regarding the assessment of marine ecology and protected species, which is notably deficient and fails to deliver a comprehensive or reliable understanding of the ecological receptors present in the West Lewis coastal environment. This marine system is recognised as being highly sensitive and biologically active, yet the baseline data gathered is inadequate, and the methodologies employed do not effectively capture essential information on species presence, behaviour, and habitat utilisation. Consequently, the assessment does not provide a solid evidential foundation for evaluating potential impacts.

A critical shortfall in the assessment relates to otters, a European Protected Species. The application does not sufficiently acknowledge or evaluate their active use of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns means that the assessment does not adequately consider the potential impacts of construction disturbance, noise, and increased activity. This lack

of thorough analysis compromises the conclusions drawn regarding the absence of significant effects on this species.

Moreover, there are further shortcomings in the assessment of basking sharks, particularly due to an overreliance on aerial surveys, which creates significant detection bias, especially in Atlantic conditions. This method is likely to underestimate the presence of basking sharks when compared to established land-based observations that indicate these waters are used frequently. The failure to incorporate or properly consider such data leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings result in claims of negligible or non-significant effects being founded on assumptions rather than solid evidence. The lack of adequate baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty about the actual scale of risk posed to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, lacking critical evidence and featuring internal inconsistencies that undermine its findings. The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already in decline. However, the application does not adequately demonstrate that these species will remain unaffected by the development. Key foraging areas and migratory pathways are within the project's location, yet the implications of displacement, collision risk, and habitat loss have not been thoroughly evaluated.

There exists a major contradiction within the application: while the developer asserts that there will be no significant adverse effects, they simultaneously pursue a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This contradiction raises serious questions regarding the reliability of the assessment and suggests that its conclusions lack sufficient evidential support. The

assessment fails to provide convincing evidence that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will not be affected. The significance of the feeding grounds has not been fully acknowledged, and reliance on modelling methods introduces uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. Methodologies used may underestimate mortality rates, especially where baseline data is incomplete and behavioural responses remain poorly understood.

Placing turbines within a recognised migratory corridor adds another substantial risk, creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The long-term effects of potential sustained mortality within this corridor have not been adequately assessed, nor have the impacts on species with relatively small global populations been considered.

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

Furthermore, the deficiencies highlighted illustrate a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not be adversely impacted places this proposal in direct conflict with national policy.

Overall, the assessment is unreliable, marred by internal inconsistencies, methodological flaws, and insufficient evidence. These deficiencies hinder a thorough evaluation of potential impacts and lead to the conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning cultural heritage and community identity is severely lacking, failing to recognise the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. Instead of acknowledging these elements as dynamic and living, the application treats heritage as a collection of isolated and static features, neglecting their ongoing social, cultural, and spiritual roles within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active burial grounds and places of spiritual practice; however, the assessment erroneously categorises them as static entities, disregarding their continued relevance, significance, and the potential impacts of development on their surrounding environment. This mischaracterisation leads to an inadequate evaluation of cultural effects and ignores their importance in the lives of the community.

Moreover, the application neglects to assess intangible cultural heritage elements, such as the Gaelic language, traditions, and the established relationship between the community and the coastal landscape. These aspects are crucial to the area's identity but are completely absent from the assessment, marking a significant oversight. Without addressing these elements, it is impossible to gain a full understanding of the cultural implications of the proposed development.

There are additional concerns regarding the rights of the community and their engagement in this process. The Gaelic-speaking population has a distinct cultural identity recognised as characteristics of an Indigenous People; however, no process of Free, Prior and Informed Consent has been undertaken. This lack of meaningful engagement not only undermines the validity of the assessment but also fails to adhere to established principles of participation in decisions that affect cultural and environmental matters.

A significant procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. The failure to conduct this assessment means that the competent authority is unable to fulfil its legal responsibilities in evaluating the social, cultural, and economic impacts on the island community. This omission alone renders any determination unlawful.

From a policy standpoint, these deficiencies put the proposal at odds with the National Planning Framework 4, particularly concerning the preservation of historic assets and places. The disregard for both tangible and intangible heritage, alongside the failure to recognise living cultural practices, represents a clear breach of policy mandates.

In summary, the neglect to properly assess living heritage, intangible cultural values, community rights, and statutory requirements results in a notable evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not sufficiently support an understanding of the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing assessment is significantly lacking in transparency, rendering it inadequate for lawful evaluation. Although a Social Impact Assessment was commissioned by the developer and included input from local residents through focus groups, the complete report remains unpublished. This lack of disclosure creates a substantial evidential gap, which hinders both the public and the competent authority from grasping the full scope of social risks highlighted by the developer's own research.

Summaries that are accessible reveal that residents are currently suffering from measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These issues stem from direct engagement with the

community and are thus firmly rooted in reality. However, the absence of the full assessment prevents thorough scrutiny of these findings and constrains the ability to evaluate their importance in the decision-making process.

Furthermore, there is clear evidence that the proposal is viewed as a threat to community identity and cohesion, with the developer's findings highlighting "cultural loss." Despite this, such impacts have not been adequately incorporated into the primary application or given the necessary consideration. The failure to release the complete Social Impact Assessment effectively obscures the genuine human and social costs associated with the development.

This lack of transparency is detrimental to the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health effects is crucial for projects of this magnitude, especially when community character and functionality may be compromised. By withholding the complete dataset, the application does not provide a thorough evidential foundation for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 concerning health and wellbeing. Developments must foster positive health outcomes and mitigate harm, yet available evidence points to existing negative impacts that have not been fully disclosed. Without the complete assessment, it is impossible to affirm compliance with this policy.

The procedural ramifications are significant, as the competent authority cannot conduct a robust socio-economic and health evaluation in the absence of the full Social Impact Assessment. This constitutes a material omission in the application and signifies a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, alongside evidence of current adverse impacts, renders the assessment inadequate and untrustworthy. This inhibits a lawful determination and strengthens the argument that the application is unsupported by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual, seascape, and landscape impacts is critically inadequate and fails to reflect both the scale of change and the sensitivity of the environment. The coastline of West Lewis is characterised by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. Introducing large-scale turbines near the shoreline would establish a continuous industrial presence, fundamentally altering this character and resulting in a permanent and irreversible transformation of the landscape.

Furthermore, the application does not accurately portray the extent of the visual change. The size and proximity of the turbines would overshadow views from residential

areas, historic sites, and popular coastal locations, which would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment fails to adequately communicate the significance of this impact in relation to such a sensitive landscape.

There are methodological issues concerning the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This suggests that the magnitude of visual impact could be understated, which calls into question the reliability of the assessment.

Moreover, the assessment overlooks the interconnectedness of landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context linked visually and spatially to the Atlantic horizon. By treating these sites as isolated entities, the assessment fails to acknowledge their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these critical connections, altering the context in which heritage assets are experienced and disrupting their relationship with the natural horizon. This situation represents not just a visual impact but a wider cultural and spatial detriment that the application has not sufficiently assessed.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 in its commitment to protecting natural spaces and historic assets. The scale of change is incompatible with the necessity to preserve landscape character, visual amenity, and the setting of culturally important sites. The lack of a thorough worst-case assessment further weakens any assertions of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is home to clean coastal waters and important habitats that are at risk of sediment disturbance and contamination. The application lacks sufficient detail to assess construction and pollution risks adequately. It involves significant seabed preparation and installation works in a high-energy Atlantic environment but does not include fully developed Construction Environmental Management Plans or

Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that will only be prepared after consent, which undermines the ability to evaluate their adequacy or effectiveness.

This reliance on undefined future measures is particularly worrying given the sensitivity of the environment. Although the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it does not provide enough information on how these risks will be prevented, controlled, or monitored. There is also uncertainty about the scale and behaviour of sediment plumes from seabed disturbance and cable installation. Without comprehensive modelling and clear management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts, which extends to potential effects on marine species and habitats identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent is granted, the application does not allow for an evaluation of whether proper safeguards are in place to address pollution events. This approach creates procedural risk and weakens the capacity of the competent authority to assess environmental protection measures at the point of determination.

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 if this information is missing, a lawful determination cannot occur. Additionally, the application fails to show compliance with policy requirements related to environmental protection and water quality.

Overall, the absence of defined mitigation measures, a lack of detailed management plans, and uncertainty regarding potential impacts result in a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks and support 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 assessment of onshore infrastructure is incomplete and does not account for the full impacts of what constitutes a single integrated project. The offshore turbines and onshore works are interdependent but are evaluated separately, leading to a fragmented understanding of the environmental and socio-economic effects.

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

project's overall environmental footprint.

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

There are significant risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not show that impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been taken. This creates a gap in evidence regarding biodiversity protection.

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline boasts exceptionally dark skies, which are crucial for the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that will be visible across long distances, creating an intrusive "wall of light" effect that will fundamentally change the night-time environment.

The Environmental Impact Assessment fails to evaluate the consequences of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of consideration is particularly concerning given the significance of dark skies to the local identity and the emerging astro-tourism sector. Consequently, there exists a clear gap in the overall landscape and environmental assessment due to this oversight.

Equally concerning is the complete absence of an evaluation regarding the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly susceptible to artificial lighting, as it can lead to disorientation and increased collision risks. The application lacks any lighting impact assessment or phototaxis study, thereby failing to examine how the proposed aviation lighting might affect these species or contribute to increased mortality rates.

The reliance on daytime survey data in the ornithological assessment only exacerbates the issue, as it does not account for nocturnal activity or the associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data constitutes a serious gap in understanding the potential ecological impacts.

Without an assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites might be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, thus engaging the precautionary principle and hindering a lawful determination.

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the criteria for sustainable development as mandated by statutory obligations, national policies, and evidential standards. This application mirrors the fundamental issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not adequately address these critical areas.

A thorough evaluation reveals that the application lacks a complete and reliable evidential basis for determination. There are substantial gaps in baseline data, an undefined design envelope is still in use, and the proposed mitigation measures remain unspecified. Additionally, important impact pathways such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism effects have been overlooked.

Consequently, the Environmental Impact Assessment is incomplete, inhibiting a full understanding of the likely significant effects or residual impacts.

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

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

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

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

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

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

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: E7DE0B21

Member of the public 1989

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

Dear Sir/Madam

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

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

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

Moreover, the unprecedented scale of the proposal, with large turbines positioned near the shoreline, raises serious concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks 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.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species within the West Lewis coastal environment is fundamentally inadequate. This marine system is both sensitive

and biologically active, yet the baseline data provided is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, and habitat usage of species. Consequently, there is no solid evidential foundation for evaluating potential impacts.

A significant oversight pertains to otters, which are classified as a European Protected Species. The application fails to adequately recognise and assess their active use of coastal areas for foraging and movement. Without considering their core foraging range and behavioural patterns, the assessment neglects to evaluate the potential impacts of construction disturbance, noise, and increased activity. This gap undermines any claims of negligible effects on this species.

Moreover, the assessment of basking sharks suffers from substantial deficiencies. The reliance on aerial surveys leads to significant detection bias, particularly under Atlantic conditions. This methodology likely underrepresents their presence, especially when compared to established land-based observations that show frequent use of these waters. By not properly incorporating such data, the assessment presents an incomplete baseline and weakens the validity of its conclusions.

These methodological shortcomings result in claims of negligible or non-significant effects being based on mere assumptions rather than solid evidence. The lack of sufficient baseline data hampers a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, introducing uncertainty about the real risks facing marine species and habitats.

From a regulatory standpoint, the application fails to comply with the Environmental Impact Assessment regime and National Planning Framework 4. The necessary identification and assessment of protected species are lacking, leading to a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt. As such, the precautionary principle is engaged, and consent cannot be lawfully granted.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application does not possess a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a deeply concerning situation, characterised by a flawed ornithological assessment that contains considerable evidence gaps and internal contradictions undermining its findings. It is critical to note that 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 convincingly establish that these species will not face adverse impacts. The development is situated within crucial foraging areas and migratory pathways, yet the assessment does not adequately

consider the risks associated with displacement, collision, or habitat loss.

There exists a fundamental contradiction within the application's conclusions, which assert no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case. This case is only applicable when significant harm is anticipated, raising serious doubts about the reliability of the assessment. Consequently, this inconsistency suggests that the conclusions drawn lack support from the evidence presented. Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical importance of these feeding grounds is inadequately addressed, and the reliance on modelling introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The methodologies employed likely underestimate mortality rates, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Additionally, the siting of turbines within a recognised migratory corridor poses an elevated risk, effectively creating a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor have not been sufficiently evaluated, nor have the potential impacts on species with relatively small global populations been considered. From a regulatory standpoint, the application fails to achieve the evidential standard required to ascertain no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside data deficiencies and limitations of 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 that would support consent.

Ultimately, the identified deficiencies reflect a non-compliance with the National Planning Framework 4 regarding the protection of biodiversity and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy. Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological shortcomings, and lack of sufficient evidence. Such deficiencies hinder a thorough evaluation of impacts and lead to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

A notable shortcoming is the treatment of culturally significant sites, specifically the

cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial sites and places for spiritual practice, yet they are mischaracterised as static features in the assessment. This oversight neglects their continued use, meaning, and the impact that development may have on their settings. As a result, the cultural effects are incompletely evaluated, disregarding their integral role in community life.

Moreover, the assessment neglects intangible cultural heritage, such as the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These aspects are fundamental to the area's identity yet are entirely omitted from the evaluation, representing a significant oversight. The cultural impact of the development remains poorly understood without the consideration of these vital factors.

There are also serious concerns regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity with characteristics that align with those of Indigenous Peoples. However, there has been no process of Free, Prior and Informed Consent conducted. This lack of meaningful engagement weakens the credibility of the assessment and fails to adhere to established principles of participation concerning cultural and environmental matters.

Additionally, a critical procedural failure is the absence of a compliant Island Communities Impact Assessment, which is a legal requirement under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This alone renders the determination unlawful.

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

In summary, the failure to assess living heritage, intangible cultural values, community rights, and statutory obligations leads to a substantial evidential gap. The cultural impacts of the development have not been sufficiently evaluated, and the application lacks a robust foundation for understanding the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the full Social Impact Assessment represents a significant evidential gap that undermines the evaluation of the proposed development. The developer engaged local residents through focus groups, yet the complete report remains unpublished. This lack of transparency obstructs both public understanding and the competent authority's ability to fully grasp the social risks highlighted in the developer's own research.

Residents are already reporting measurable levels of stress, anxiety, and concern due

to the scale and proximity of the proposal. These impacts stem from direct engagement and are not speculative. However, without access to the full assessment, there is inadequate scrutiny of the findings, which limits the assessment of their significance in the decision-making process.

Moreover, the proposal is viewed as a direct threat to community identity and cohesion, with findings indicating potential “cultural loss” that have not been adequately considered in the main application. The failure to fully integrate these impacts diminishes the acknowledgment of the true human and social costs associated with the development.

The withholding of the full Social Impact Assessment compromises the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health implications is crucial for developments of this magnitude, particularly when they may impact community character and functioning. By not providing the entire dataset, the application lacks a complete evidential basis for balancing benefits against potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development should foster positive health outcomes and mitigate harm; however, existing adverse effects, which have not been fully disclosed, suggest a failure to meet this requirement. Without the complete assessment, adherence to this policy cannot be validated.

The procedural implications of this situation are profound. The competent authority cannot conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This omission is a significant shortfall within the application and fails to satisfy the evidential demands of the Environmental Impact Assessment regime.

Collectively, the non-disclosure of the complete Social Impact Assessment, alongside evidence of current adverse impacts, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information to be supported.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts and the associated seascape and landscape implications is seriously flawed and does not sufficiently acknowledge the extent of change nor the sensitivity of the receiving environment. The open Atlantic horizon and undeveloped character of the West Lewis coastline contribute to a strong sense of remoteness. Introducing large-scale turbines in proximity to the shoreline would create a significant and ongoing industrial presence, which would fundamentally transform the character of this landscape in a permanent and irreversible way.

Moreover, the proposal fails to accurately portray the magnitude of the anticipated visual change. Due to their scale and proximity, the turbines would dominate views

from residential areas, historic sites, and popular coastal locations. This would directly diminish visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment inadequately reflects the significance of these impacts within such a sensitive landscape context.

Methodological issues also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. Consequently, there is a risk that the actual visual impact has been minimised, which calls into question the assessment's overall reliability.

Additionally, the assessment neglects to consider the interconnectedness of the landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. Treating these as isolated assets fails to acknowledge their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and affecting their connection to the natural horizon. This is not merely a visual concern; it represents a wider cultural and spatial detriment that has not been sufficiently examined in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, especially regarding the protection of natural places and historic assets. The level of change proposed is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a rigorous worst-case assessment further weakens any assertion of policy adherence.

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

In summary, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings inhibit a credible evaluation and reinforce the position that the proposal is incompatible with the protection of this landscape.

FISHERIES AND MARINE LIFE

The application presents a concerning lack of thorough assessment regarding fisheries and marine life, failing to provide a robust evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast, which support a diverse marine ecosystem and a vital fishing industry, are not adequately considered in terms of protection or maintenance from significant disruption.

A critical problem lies in the assumption that fishing activities can be displaced without any repercussions. The application offers no evidence supporting the availability or accessibility of alternative fishing grounds that could accommodate additional pressure. This notable omission carries substantial risk, as such displacement could lead to overfishing in other areas and may have far-reaching economic consequences for the local fishing fleet. The lack of a clear, evidence-based assessment obscures a proper understanding of the potential impacts on fisheries and livelihoods.

Moreover, the proposal presents 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 extensive distances, adversely affecting species like dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population is alarming; however, the application minimizes the importance of these effects, lacking sufficient supporting evidence.

There exists a troubling inconsistency within the application, wherein the necessity for licences to authorise harm to European Protected Species is acknowledged, while simultaneously stating that the anticipated impacts are negligible. This contradiction severely undermines the credibility of the assessment and raises significant concerns regarding compliance with the Habitats Regulations, especially in cases where anticipated harm would require legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts resulting from multiple 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 compliance with the National Planning Framework 4 or the National Marine Plan. It fails to establish that the proposed development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which obstructs any conclusion that the proposal embodies sustainable development.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the standards necessary for sustainable development when evaluated against relevant statutory duties and national policies. This situation mirrors the issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was

deemed unacceptable. Presently, the application is submitted under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

The application lacks a reliable and complete evidential basis for decision-making. It is marked by significant gaps in baseline data, an undefined design envelope, unspecified mitigation measures, and critical omissions regarding impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, preventing a comprehensive understanding of the likely significant effects and residual impacts.

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

Furthermore, the proposal conflicts directly with National Planning Framework 4. It does not effectively demonstrate the protection of biodiversity, natural environments, and cultural heritage. Additionally, it fails to provide evidence that health and wellbeing impacts are acceptable, or that there is a net economic benefit, particularly due to the lack of tourism impact modelling. The cumulative effects of offshore and onshore components have not been adequately assessed, obscuring their potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are both incomplete and, at times, inconsistent. The evidential standard necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and precluding a lawful conclusion that impacts are acceptable.

Moreover, the proposal is poised to induce considerable and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and adverse impacts on tourism are all permanent consequences that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unsuitable for determination. The extensive information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. Therefore, the competent authority must refuse consent on these grounds or invoke the necessary regulatory provisions to obtain the missing information.

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

Additional Comments

Families with young children will be living in close proximity to these wind turbines, the potential health impact of this is totally unknown. How you can propose to erect something so close to a beautiful island and just let the people living there become your guinea pigs in some kind of experiment, is honestly unfathomable.

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: BE2BA952

Member of the public 1990

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, nearly untouched environment, and robust cultural identity. The scale and design of this proposal, along with its proximity to the shoreline, give rise to significant concerns regarding its compatibility with statutory requirements and national policy, particularly in relation to sustainable development principles.

A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals material deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. There is a notable absence of critical environmental data, with baseline information being both limited and inconsistent. Key elements of the proposal remain undefined, and the use of a flexible design framework obscures a clear understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures means that their effectiveness cannot be properly evaluated. Consequently, the documentation falls short of providing a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible effects lack robust supporting evidence.

Policy conflicts are evident and substantive. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural spaces, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These policy discrepancies directly impact the statutory tests necessary for consent and challenge the ability of the competent authority to conclude that the development aligns with policy standards.

The unprecedented scale of the proposal, involving large turbines in close proximity to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. In light of these issues, the precautionary principle should be invoked.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

Furthermore, there are indications that the proposal is viewed as a threat to community identity and cohesion, with “cultural loss” being noted in the developer’s findings. Despite these critical impacts, they have not been adequately incorporated into the main application or given the appropriate weight. The withholding of the full Social Impact Assessment obscures the true human and social costs of the development.

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

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal presents significant shortcomings in its adherence to the principles of sustainable development, particularly when evaluated against statutory obligations, national policy, and evidential benchmarks. This application echoes the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. Despite being submitted under a more robust policy framework that prioritises biodiversity, peatland conservation, landscape integrity, and community wellbeing, it still fails to meet essential requirements.

Crucial gaps in baseline data are evident, along with an undefined design envelope, and there is an overreliance on unspecified mitigation measures. Additionally, key impact pathways related to nocturnal wildlife, complete onshore infrastructure, and tourism effects have been overlooked. The Environmental Impact Assessment is therefore

inadequate, failing to provide a comprehensive understanding of the likely significant effects or any residual impacts.

Moreover, procedural deficiencies are apparent. The lack of a compliant Island Communities Impact Assessment breaches the statutory duty outlined in the Islands (Scotland) Act 2018, and the failure to present a complete Social Impact Assessment is a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal stands in direct opposition to National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural environments, or cultural heritage. It also fails to ensure 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 impacts of offshore and onshore components have not been thoroughly evaluated, leaving potential effects on peatlands, carbon balance, habitats, and crofting land obscured.

Environmental risks remain ambiguous and may be substantial. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent within their findings. The evidential requirement to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and preventing a lawful conclusion about the acceptability of impacts.

The proposal threatens to bring about profound and irreversible changes to a 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 enduring impacts that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively inadequate for determination. The multitude of information deficiencies, coupled with policy conflicts and unresolved environmental uncertainties, obstructs a lawful and evidence-based decision. The competent authority must either reject this application outright or invoke regulatory provisions to demand the submission of the missing information.

Consequently, it is formally requested that the application for the Spiorad na Mara Offshore Wind Farm is entirely refused.

Additional Comments

We have had friends visit from the Isle of Lewis and enjoyed the pictures of the seashore. I would hate to have these open views desecrated with wind turbines.

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: 240E1BC3

Member of the public 1991

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

Dear Sir/Madam

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

There are clear and substantive policy conflicts within the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application fails to demonstrate that national requirements to protect biodiversity, climate interests, and environmental integrity can be met. These conflicts directly impact the statutory tests required for consent and undermine the capacity of the competent authority to determine that the development is acceptable in policy terms.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The current application presents significant deficiencies in its assessment of marine ecology and protected species, particularly within the sensitive and biologically active marine environment of West Lewis. The methodologies employed lack the depth required to capture a comprehensive understanding of species presence, behaviour, and habitat use, leading to incomplete baseline data that undermines the reliability of

the evaluation of potential impacts.

A notable gap in the assessment pertains to otters, which are classified as a European Protected Species. The application does not adequately recognise their active use of coastal areas for foraging and movement. This oversight means that critical aspects such as their core foraging range and behavioural patterns have not been appropriately considered, leaving the assessment of potential construction disturbances, noise, and increased activity unexamined. Consequently, the conclusions drawn regarding the absence of significant effects on otters are fundamentally flawed.

Further issues arise in the assessment of basking sharks, where the reliance on aerial surveys introduces a significant detection bias, particularly in Atlantic conditions. This methodological approach risks underestimating the presence of basking sharks, especially when juxtaposed with well-established land-based observations that indicate frequent usage of these waters. The failure to incorporate or adequately consider such data culminates in an incomplete baseline, casting doubt on the reliability of the conclusions reached.

The shortcomings in methodology lead to conclusions of negligible or non-significant effects being based more on assumptions than on robust evidence. Additionally, the lack of sufficient baseline data inhibits a meaningful evaluation of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This generates uncertainty about the true extent of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set out by the Environmental Impact Assessment regime and the National Planning Framework 4, given that protected species have not been sufficiently identified or assessed. The uncertainty introduced by these deficiencies precludes the dismissal of adverse effects with reasonable scientific certainty, thus invoking the precautionary principle. Under these conditions, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions fundamentally undermines the assessment's reliability. These factors obstruct a thorough evaluation of impacts on marine ecology and protected species, reinforcing the argument that the application fails to present a sufficient evidential foundation.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline should be recognised as a living cultural landscape where environment, language, tradition, and community are interwoven. However, the assessment of cultural heritage and community identity is fundamentally inadequate. It adopts a reductive approach by treating heritage as isolated, static assets, ignoring their ongoing social, cultural, and spiritual functions within the community.

Culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are

active places of burial and spiritual practice. Nonetheless, these locations have been mischaracterised as static features, with the assessment failing to consider their continued use and the development's impact on their settings. This oversight leads to an incomplete evaluation of cultural effects and neglects their importance in community life.

Moreover, the assessment disregards intangible cultural heritage, including the Gaelic language and traditions, along with the long-standing relationship between the community and the coastal environment. These elements are vital to the area's identity but are entirely omitted from the evaluation, representing a significant gap. Without incorporating these factors, the true cultural impact of the development cannot be adequately understood.

The absence of meaningful engagement with the Gaelic-speaking population, who possess a distinct cultural identity and characteristics of an Indigenous People, raises serious concerns about community rights. No process of Free, Prior and Informed Consent has been undertaken, undermining the legitimacy of the assessment and violating established principles of participation regarding decisions that affect cultural and environmental interests.

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

From a policy standpoint, these shortcomings place the proposal in direct conflict with National Planning Framework 4, particularly regarding the protection 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 breach of policy requirements.

Collectively, these failures to assess living heritage, intangible cultural value, community rights, and statutory obligations lead to a significant evidential gap. The cultural impacts of the development have not been properly evaluated, and the application lacks a sufficient foundation for determining the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing lacks the necessary transparency for a lawful assessment. While a Social Impact Assessment was commissioned by the developer, including focus groups with local residents, the complete report has not been made available. This absence of information creates a significant 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 research.

Residents are reportedly experiencing stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement and are not mere speculation. However, the failure to disclose the complete assessment prevents thorough scrutiny of these findings, limiting the capacity to evaluate their significance in the decision-making process.

Furthermore, the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this recognition, such impacts have not been sufficiently integrated into the application or given adequate consideration. The withholding of the full Social Impact Assessment obscures the true social and human costs associated with the development.

This lack of transparency compromises the Environmental Impact Assessment process. Understanding social, economic, and health impacts is crucial for developments of this scale, particularly those that may affect community character and functioning. Without the complete dataset, the application does not provide a comprehensive evidential basis for weighing benefits against harm.

From a policy standpoint, the application fails to align with National Planning Framework 4 regarding health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm, yet the available evidence suggests existing adverse effects that have not been fully revealed. Without the full assessment, compliance with this policy cannot be verified.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This constitutes a material omission within the application and a failure to satisfy the evidential standards of the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

Moreover, the application fails to adequately portray the extent of this visual change.

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

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies in the assessment of construction and pollution risks, which is inadequate for evaluating the probable environmental impacts. Critical environmental management frameworks, specifically Construction

Environmental Management Plans and Pollution Prevention Plans, are either poorly developed or absent, particularly given the extensive seabed preparation and installation activities proposed within the high-energy environment of the Atlantic. The reliance on unspecified mitigation and contingency measures, which are to be formulated after consent, hampers any meaningful assessment of their potential effectiveness or sufficiency.

Particularly alarming is the sensitivity of the receiving environment, notably the West Lewis coastline, which is home to clean coastal waters and vital habitats susceptible to disturbances from sediment and contaminants. Although the application acknowledges the risks related to sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to offer adequate information on the strategies for preventing, managing, or monitoring these risks.

Furthermore, there exists a degree of uncertainty concerning the magnitude and dynamics of sediment plumes that may arise from seabed disruption and cable installation. The absence of comprehensive modelling and clearly articulated management strategies renders it impossible to ascertain the potential extent, duration, or ecological implications of such impacts. This uncertainty also encompasses effects on marine species and habitats, which are already recognised as sensitive within the broader assessment framework.

The lack of specific emergency response protocols exacerbates these issues. By postponing contingency planning until after consent is granted, the application undermines the ability to verify whether sufficient safeguards are in place to manage pollution events. This introduces procedural risks and hampers the competent authority's capacity to evaluate environmental protection measures prior to the determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contravenes the obligations set forth by the Environmental Impact Assessment regime. The assessment of likely significant effects and necessary mitigation measures must occur prior to granting consent; the absence of such information precludes a lawful determination. Additionally, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of clearly defined mitigation strategies, insufficient management plans, and uncertainties surrounding potential impacts culminate in a materially deficient assessment. These significant shortcomings 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 a diverse marine ecosystem and support an active fishing industry. Despite this, the application does not adequately address the potential ecological or socio-economic impacts, failing to ensure that

these vital uses and habitats can be protected without significant disruption. A major concern is the unsubstantiated assumption that fishing activities can be displaced without negative consequences. The application lacks evidence to confirm that alternative fishing grounds are available and capable of supporting the increased pressure that such displacement would cause. This oversight is critical, as it raises the risk of overfishing in other areas and may lead to broader economic implications for the local fishing fleet. Without a detailed and evidence-based assessment, the effects on fisheries and local livelihoods remain unclear.

Moreover, the proposal poses significant risks to marine species, especially due to the underwater noise generated during construction. The high-energy hammer piling anticipated over an extended period is likely to disturb marine life across considerable distances, notably affecting species like dolphins. The potential disruption to a significant portion of the local bottlenose dolphin population is alarming, yet the application downplays these risks, lacking the necessary supporting evidence to justify such minimisation.

There is also a troubling inconsistency within the application, as it acknowledges the need for licenses to permit harm to European Protected Species while simultaneously characterising these impacts as negligible. This contradiction undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, particularly where anticipated harm necessitates legal authorisation.

Furthermore, the assessment does not adequately consider the cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately determined.

From a policy standpoint, the application fails to demonstrate adherence to National Planning Framework 4 or the National Marine Plan. It does not show 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 embodies sustainable development.

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

SUMMARY

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

policy framework that prioritises biodiversity, peatland protection, landscape integrity, and the wellbeing of communities.

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

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

This proposal conflicts directly with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural environments, and cultural heritage, nor does it sufficiently address health and wellbeing impacts or prove a net economic benefit, particularly due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been assessed thoroughly, clouding the understanding of effects on peatlands, carbon balance, habitats, and crofting land.

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

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

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

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: 846A83F6

Member of the public 1992

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.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the ornithological

assessment associated with the application is materially flawed, presenting significant gaps in evidence and internal inconsistencies that undermine its conclusions. Despite the location of the development within key foraging areas and migratory pathways, the application fails to adequately demonstrate that these species will not be adversely affected. The assessment does not robustly evaluate critical issues such as displacement, collision risk, or habitat loss.

A key contradiction arises within the application itself, as the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that its conclusions lack sufficient support from the underlying evidence. Furthermore, the assessment does not convincingly show that seabirds associated with protected sites like the Lewis Peatlands and St Kilda will remain unaffected. The significance of these feeding grounds is inadequately addressed, and the reliance on modelling approaches introduces uncertainty, particularly for species experiencing severe decline such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, particularly in light of incomplete baseline data and insufficient understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor presents an additional risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to thoroughly assess the long-term consequences of sustained mortality within this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold needed to confirm no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, hindering the ability to reach a lawful conclusion in favour of consent.

Moreover, the deficiencies noted reflect a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected places the proposal in direct conflict with national policy. Collectively, these factors render the assessment unreliable, due to internal inconsistencies, methodological weaknesses, and insufficient evidence. Such shortcomings hinder a robust evaluation of impacts and lead to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development involves the installation of large-scale turbines along the West Lewis coastline, which is characterised by its open Atlantic horizon, undeveloped

nature, and a strong sense of remoteness. This initiative would result in a significant industrial presence that fundamentally alters the existing character of the landscape, leading to a permanent and irreversible transformation. The application fails to accurately represent the magnitude of the visual change, as the scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. Consequently, this would adversely affect visual amenity, undermining the qualities of naturalness and remoteness that currently define the area.

Methodological concerns arise from the selection and presentation of visual viewpoints, which may not adequately capture 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 assessment has understated the magnitude of visual impact, compromising the reliability of its findings. Furthermore, the interconnected relationship between landscape, seascape, and cultural heritage has not been properly assessed. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are linked to the wider landscape through visual and spatial relationships with the Atlantic horizon. The assessment treats these heritage assets as isolated, neglecting their interdependence and resulting in an incomplete evaluation of impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are experienced and severing their connection to the natural horizon. This change represents not only a visual impact but also a broader cultural and spatial harm that has not been adequately considered in the application. From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, which seeks to protect natural places and historic assets. The scale of the proposed changes is incompatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The failure to conduct a robust worst-case assessment further undermines any claims of compliance with policy requirements.

Moreover, the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resulting changes are therefore fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation strategies. Collectively, these deficiencies in the assessment prevent a reliable evaluation of the proposal's impacts, reinforcing the conclusion that it is incompatible with the protection of the landscape.

CONSTRUCTION AND POLLUTION RISKS

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

prevention, control, or monitoring of these risks.

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

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the criteria for sustainable development as mandated by statutory obligations, national policies, and evidential standards. This application mirrors the fundamental issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not adequately address these critical areas.

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

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

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

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

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

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

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

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: 3BA435BD

Member of the public 1993

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

Dear Sir/Madam

This letter formally objects to the Spiorad na Mara Offshore Wind Farm application, which was submitted under marine licensing and Environmental Impact Assessment regulations. The objection is founded on a review of the Environmental Impact Assessment Report and its accompanying documents. It identifies significant planning, environmental, cultural, and procedural deficiencies within the proposal. This development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, nearly untouched environment, and strong cultural identity. Concerns arise regarding the scale, proximity, and design of the project, as these factors appear to conflict with statutory requirements, national policy, and sustainable development principles.

The application does not present an adequate evidential basis for lawful determination. There is missing critical environmental data, and the baseline information provided is both limited and inconsistent. Additionally, key aspects of the proposal remain unspecified. The flexible design framework used in the application obstructs a clear understanding of significant effects, and without defined mitigation measures, it is impossible to assess their effectiveness. Consequently, the submitted documentation fails to provide a complete or informed understanding of the environmental, cultural, or community impacts. Claims asserting negligible or non-significant effects lack robust supporting evidence.

There are substantial policy conflicts present. The proposal seems inconsistent with the National Marine Plan, Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly evident concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not prove that it can meet the national requirements for protecting biodiversity, climate interests, and environmental integrity. These discrepancies challenge the statutory tests necessary for obtaining consent and hinder the competent authority's ability to determine the proposal's acceptability according to policy.

The unprecedented scale of this proposal, which includes large turbines placed near the shoreline, raises significant concerns related to landscape capacity, visual dominance, and environmental impact. When considering the insufficient information provided, the reliance on undefined mitigation measures, evidential weaknesses, and clear policy violations, it is evident that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be applied.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment provided for the proposed development overlooks vital aspects of cultural heritage and community identity, particularly in relation to the West Lewis coastline. This area embodies a living cultural landscape where the environment, language, tradition, and community are interconnected. Instead of recognising these dynamic relationships, the application reduces heritage to a collection of static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

A significant shortcoming in the assessment is its treatment of culturally important sites such as the cemeteries located at Dalmore, Bragar, and Barvas. These cemeteries serve as active sites of burial and spiritual practice, yet they are presented as static features, disregarding their continued use and the implications of development on their surroundings. This misrepresentation leads to an inadequate evaluation of cultural effects and overlooks the role these sites play in community life.

Moreover, the application does not address intangible cultural heritage, which includes the Gaelic language, local traditions, and the longstanding relationship that the community has with the coastal environment. These elements are critical to the area's identity but are completely missing from the assessment, indicating a significant oversight. Without acknowledging these factors, the full cultural impact of the development remains obscured.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity, recognised under the characteristics of an Indigenous People, yet the process of Free, Prior and Informed Consent has not been followed. This lack of meaningful engagement calls into question the validity of the assessment and does not adhere to established principles for participation in matters that affect cultural and environmental interests.

Additionally, there is a critical procedural flaw due to 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, which prevents a lawful determination of the application.

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

In summary, the failure to adequately assess living heritage, intangible cultural values, community rights, and the necessary statutory obligations results in a substantial evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application fails to establish a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposal is significantly deficient, lacking the necessary transparency for a lawful evaluation. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the complete report has not been made available. This absence creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to fully grasp the social risks identified through the developer's research.

Summaries available indicate that residents are currently experiencing notable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement and are thus not speculative in nature. Nonetheless, the failure to disclose the complete assessment prevents thorough scrutiny of the findings and restricts the ability to evaluate their significance within the decision-making framework.

Evidence suggests that the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” being highlighted in the developer's own findings. Despite this acknowledgement, the impacts have not been adequately incorporated into the main application nor assigned appropriate weight in the decision-making process. The withholding of the full Social Impact Assessment obscures the true human and social costs of the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially where the character and functioning of the community may be at stake. The failure to provide the full dataset results in an incomplete evidential basis for assessing the balance of benefits against harm.

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 evidence available indicates existing adverse effects that have not been fully disclosed. Without the complete assessment, compliance with this policy remains unsubstantiated.

The procedural implications of these deficiencies are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a material omission within the application and a failure to fulfil the evidential requirements mandated by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, along with the evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation precludes a lawful determination and underscores 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, undeveloped nature, and a profound sense of remoteness. The proposed introduction of large-scale turbines near the shoreline poses a significant threat, as this would create a continuous industrial presence that fundamentally alters the unique character of this landscape. Such a transformation would be permanent and irreversible, fundamentally changing the views and experiences of the area.

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

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

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

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

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

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

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

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.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as stipulated by statutory duties, national policy, and evidential standards. It echoes the primary concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This current application is submitted under a policy framework that ostensibly strengthens the emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still falls short.

A critical examination reveals that the application lacks a complete and reliable evidential basis for determination. Significant gaps in baseline data exist, alongside the continued use of an undefined design envelope. The reliance on unspecified mitigation measures and the exclusion of crucial impact pathways, particularly relating to nocturnal wildlife, the full extent of onshore infrastructure, and potential tourism effects, leave the Environmental Impact Assessment incomplete. This inadequacy precludes a comprehensive understanding of likely significant effects or residual impacts.

Moreover, clear procedural shortcomings are present. The absence of a compliant Island Communities Impact Assessment signifies a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to provide a complete Social Impact Assessment is a serious omission. These inadequacies 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 stark contradiction to the National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural spaces, and cultural heritage. Furthermore, it fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, largely due to insufficient tourism impact modelling. The cumulative effects of both offshore and onshore components have not been appropriately assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The necessary evidential standard to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, necessitating the application of the precautionary principle and barring a lawful conclusion regarding acceptable impacts.

Furthermore, the proposal would induce substantial and irreversible changes to a

highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the adverse effects on tourism represent permanent changes that cannot be effectively mitigated.

In summary, the application is procedurally and substantively unfit for determination. The significant information deficiencies, alongside policy conflicts and unresolved environmental risks, obstruct a lawful, evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or invoke the relevant regulatory provisions to compel the submission of the missing information.

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

Additional Comments

We live on a very unique and beautiful island. Adding wind turbines will take away so much of that beauty. Also with added light pollution and impacts to residents health who live close by.

Why change something that does not need to be changed. Keep it scenic.

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: 195FADE2

Member of the public 1994

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from an examination of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural integrity. The development is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, relatively untouched environment, and strong cultural heritage. The proposal's scale, proximity to the shore, and design prompt serious concerns regarding its alignment with statutory obligations, national policy, and sustainable development principles.

The application lacks an adequate evidential foundation for a lawful decision. There is a notable absence of critical environmental data, limited and inconsistent baseline information, and several key elements of the proposal remain unclear. The proposal's flexible design framework hinders a thorough understanding of potential significant effects, while the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the existing documentation does not facilitate a comprehensive or informed appraisal of the environmental, cultural, or community impacts, nor do the assertions of negligible or non-significant effects rest on solid evidence.

Substantial conflicts with policy are evident. The proposal seems to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It does not adequately show that national standards for protecting biodiversity, climate considerations, and environmental integrity can be achieved. These discrepancies undermine the statutory tests essential for consent and compromise the ability of the competent authority to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal at this site, with large turbines planned near the shoreline, raises significant issues regarding landscape capacity, visual dominance, 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 support a lawful determination. In light of these factors, it is necessary to apply the precautionary principle.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is incomplete and does not provide a clear or accurate account of the likely environmental effects of the proposal. The reliance on a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This uncertainty hinders a consistent application of a worst-case scenario, compromising the integrity of the assessment and obscuring the true extent of environmental effects from both the public and the competent authority.

Furthermore, the application depends on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent based on the premise that environmental harm will be managed later obstructs a meaningful evaluation of effectiveness and the assessment of residual impacts. Deferring crucial information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which stipulates that significant effects and mitigation must be clearly established before any determination is made.

In addition, there are substantial evidential gaps, including deficiencies in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects lack robust supporting data. The failure to provide adequate information prevents a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot align with statutory requirements.

As a result, the application does not meet the evidential standards set by the Habitats Regulations, which require the exclusion of adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it has not been established that impacts have been fully assessed or that appropriate safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development raises significant concerns regarding its impact on the environment, particularly in relation to internationally important seabird populations on the west coast of the Isle of Lewis. The application does not sufficiently demonstrate that these species, many of which are already declining, will not be adversely affected. Located within key foraging areas and migratory pathways, the site poses risks that the ornithological assessment fails to adequately address, such as displacement, collision risk, and habitat loss.

Moreover, there exists a fundamental contradiction within the application itself. The

developer asserts that there will be no significant adverse effects while also advancing a case for Habitats Regulations derogation, a measure only necessitated when significant harm is anticipated. This inconsistency undermines the reliability of the assessment, casting doubt on its conclusions which are not supported by robust underlying evidence.

The assessment particularly lacks sufficient evidence regarding the effects on seabirds associated with protected sites like the Lewis Peatlands and St Kilda. The critical feeding grounds for these species are inadequately acknowledged, and the modelling approaches used introduce a level of uncertainty, especially for species that are in severe decline, such as Kittiwakes and Fulmars. Methodologies applied in the assessment are likely to underestimate potential mortality, particularly given the incomplete baseline data and insufficient understanding of behavioural responses.

Additionally, placing turbines within a recognised migratory corridor poses an elevated risk, creating barriers in the primary flight path of species migrating between the United Kingdom and Iceland. The application does not thoroughly evaluate the long-term consequences of increased mortality within this corridor or the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application fails to meet the evidential threshold required to establish that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, combined with significant data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This situation invokes the precautionary principle, which prevents reaching a lawful conclusion in favour of consent.

Ultimately, the identified deficiencies illustrate non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected places the proposal directly in conflict with national policy.

In conclusion, the assessment is fundamentally flawed due to its internal inconsistencies, methodological weaknesses, and lack of adequate evidence. These deficiencies hinder a comprehensive evaluation of the potential impacts and support the overall finding that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The 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 lack of transparency surrounding the Social Impact Assessment is deeply concerning and significantly undermines the evaluation of social impacts, health, and wellbeing associated with this development. Although the developer conducted focus groups with local residents, the full report has not been made available. This gap in evidence hinders both public understanding and the competent authority's ability to grasp the full extent of social risks identified through the developer's own work.

Residents are already reporting measurable stress, anxiety, and concern related to the scale and proximity of the proposal, and these impacts arise from direct engagement rather than speculation. However, without access to the complete assessment, it is impossible to scrutinise the findings thoroughly or to appreciate their significance in the decision-making process.

Moreover, there is an evident perception that the proposal threatens community identity and cohesion, with the developer's own findings noting a risk of "cultural loss." Despite this, these critical impacts have not been adequately integrated into the main application or given the necessary consideration. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the proposed development.

This situation adversely affects the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly in terms of their effects on community character and functioning. The lack of the complete dataset undermines the application, preventing a thorough assessment of the balance between potential benefits and harms.

From a policy standpoint, the application fails to align with National Planning Framework 4 regarding health and wellbeing, which stipulates that developments should promote positive health outcomes while avoiding harm. The available evidence suggests existing adverse effects that have not been fully disclosed, making it impossible to demonstrate compliance with this policy without the complete assessment.

Procedurally, the implications are significant. The competent authority cannot conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This omission represents a serious flaw within the application and indicates a failure to meet the evidential requirements mandated by the Environmental Impact Assessment framework.

Collectively, the non-disclosure of the full Social Impact Assessment, alongside evidence of existing negative impacts, results in an incomplete and unreliable assessment. This scenario not only obstructs a lawful determination but also reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of seascape, landscape, and visual impacts is significantly lacking, failing to appropriately capture the scale of change and the sensitivity of the receiving environment. The character of the West Lewis coastline is characterised by its expansive Atlantic horizon, undeveloped nature, and pronounced sense of remoteness. The proposed installation of large-scale turbines close to the shoreline would establish a continuous and overwhelming industrial presence, fundamentally altering this character and leading to a permanent and irreversible change to the landscape.

There is an inadequate representation of the extent of visual change in the application. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would have a direct negative impact on visual amenity, compromising the essential qualities of naturalness and remoteness. The assessment does not adequately communicate this level of impact or its significance within the context of such a sensitive landscape.

Additionally, there are concerns regarding the methodology used for 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 significant landscapes. This raises the possibility that the extent of visual impact has been downplayed, which undermines the reliability of the assessment.

Another critical shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these cultural assets as separate entities, disregarding their interdependence and resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 concerning the safeguarding of natural places and historic assets. The magnitude of change is incompatible with the requirements to protect landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a thorough worst-case scenario assessment further challenges any claims of compliance with policy.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be unavoidable and dominant. Therefore, the resulting change is fundamentally permanent, rather than amenable to reduction through mitigation efforts.

In summary, the assessment fails to accurately represent the extent of impact, the sensitivity of the environment, and the interrelated nature of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is lacking. It does not provide enough detail to understand the likely environmental effects. The proposal includes significant seabed preparation and installation works in a high-energy Atlantic environment, yet there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures to be created after consent, which hinders any proper evaluation of their adequacy or effectiveness.

This dependence on unspecified future measures raises concerns, especially given the sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disturbance and contamination. While the application acknowledges the risks associated with sediment mobilisation and accidental chemical or oil spills, it fails to offer sufficient information on how these risks will be prevented, controlled, or monitored.

There is uncertainty about the size and behaviour of sediment plumes caused by seabed disturbance and cable installation. Without reliable modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also applies to the potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Additionally, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application limits the ability to evaluate whether adequate measures are in place to respond to pollution events. This introduces procedural risks and undermines the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated before consent is granted, and without this information, a lawful determination cannot be achieved. The application also does not show compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts make the assessment materially inadequate. These deficiencies obstruct a thorough evaluation of construction and pollution risks and strengthen the view that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal lacks a thorough assessment of fisheries and marine life, failing to provide a comprehensive evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and a vibrant fishing industry. However, the application does not convincingly demonstrate that

these vital uses and habitats can be safeguarded or preserved without significant disruption.

A crucial concern lies in the erroneous assumption that fishing activities can be displaced without repercussions. The application lacks evidence to support the availability, accessibility, or capacity of alternative fishing grounds to sustain additional pressure. This notable absence poses a considerable risk of overfishing in different areas, which may have broader economic ramifications for the local fleet. The absence of a clear and evidence-based assessment renders the impacts on fisheries and local livelihoods difficult to understand.

Moreover, the proposal introduces considerable risks to marine species, particularly due to the underwater noise produced during construction. The extended high-energy hammer piling is expected to create disturbances over extensive distances, affecting various species including dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises substantial concerns; however, the application minimises the importance of these effects, lacking adequate supporting evidence.

The application presents a contradiction by acknowledging the necessity for licences to permit harm to European Protected Species while simultaneously claiming that the impacts are negligible. This inconsistency undermines the credibility of the assessment and raises issues regarding adherence to the Habitats Regulations, especially where harm is expected to a degree that necessitates legal authorisation.

Furthermore, the assessment does not adequately address cumulative impacts that arise from multiple pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it remains impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The onshore works associated with the project, including cabling across protected moorland and the construction of a substation near Stornoway, introduce significant risks to sensitive habitats. The proposed access infrastructure runs through landscapes

that are ecologically fragile, particularly involving excavation across deep peat areas, notably within Barvas Moor, which serves as a crucial carbon store and sensitive habitat. The application fails to provide a comprehensive assessment of these impacts, which hinders a full understanding of the project's environmental footprint.

The risks extend to the machair systems and peatland environments, which are protected under existing policy. The application does not demonstrate that the impacts on these habitats have been thoroughly evaluated, nor does it show that appropriate avoidance measures have been implemented. This represents a substantial evidential gap concerning biodiversity protection.

Moreover, the assessment of onshore infrastructure is materially incomplete as it considers the offshore turbines and onshore works separately. This fragmented approach obscures the true scale of the environmental and socio-economic effects, preventing a proper evaluation of cumulative impacts. The Environmental Impact Assessment process mandates that all components of a project be assessed together; however, the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not adequately understood.

The disturbance of peatland associated with these works raises serious concerns about carbon balance. The release of stored carbon could lead to a carbon debt that undermines the very objectives of renewable energy development. Yet the application does not sufficiently address this issue or demonstrate that the overall carbon balance remains positive.

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

From a policy standpoint, the failure to assess the project holistically and to demonstrate protection for peatlands, habitats, and land use interests is at odds with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application. Consequently, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts render this part of the application incomplete and unreliable, preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The 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 inadequate, failing to evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. The local tourism industry relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. While it is acknowledged that 86% of visitors are attracted by the scenery, there is no quantitative analysis of how large-scale offshore infrastructure could influence visitor numbers, behaviours, or the economic contributions of tourism.

Tourism has experienced considerable 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. However, the application neglects to model the potential effects of industrialising the seascape and the associated loss of environmental quality on Tourism Gross Value Added and the broader economic resilience. In the absence of such an analysis, it remains unclear whether the proposed development would yield a net economic benefit or jeopardise a well-established and expanding sector.

The analysis also overlooks the significance of environmental quality in attracting tourists, particularly the value of unspoiled landscapes and dark skies to visitor experiences and emerging sectors like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, resulting in a substantial gap in understanding the implications for a recognised and growing part of the local economy.

For an island community with limited economic diversification, the neglect to assess the impacts on tourism carries broader ramifications for employment, local businesses, and community sustainability. The absence of a proper Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately examined as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not show compliance with National Planning Framework 4, especially regarding economic impact and the necessity to demonstrate net benefits. It conflicts with strategic objectives that position tourism as a priority growth sector and fails to present sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

Overall, the lack of quantification of tourism impacts, failure to assess the environmental factors driving visitor behaviour, and disregard for the island's economic dependencies culminate in a significant evidential gap. This hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm does not meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. It presents issues similar to those that caused the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new application is submitted under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet still fails to address these crucial aspects.

The application lacks a thorough and reliable basis for determination. There are significant gaps in the baseline data, and it continues to employ an undefined design envelope. Additionally, it relies on unspecified mitigation measures and overlooks key

impact pathways related to nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment remains incomplete, hindering a full understanding of potential significant effects and residual impacts.

There are notable procedural shortcomings as well. The failure to provide a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018. Furthermore, not disclosing the full Social Impact Assessment is a significant omission. These shortcomings inhibit the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal contradicts National Planning Framework 4. It does not adequately protect biodiversity, natural places, and cultural heritage. Health and wellbeing impacts are not shown to be acceptable, and there is no evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts of offshore and onshore elements have not been properly evaluated, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties and potentially significant environmental risks remain. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in certain areas. The evidential threshold required to prove that adverse effects are excluded beyond reasonable scientific doubt has not been reached, invoking the precautionary principle and making it impossible to legally conclude that impacts are acceptable.

The proposal would bring about considerable and irreversible changes to a highly sensitive landscape. It would industrialise the Atlantic-facing coastline, result in a loss of dark skies, disrupt cultural and visual relationships, and have impacts on tourism, leading to permanent effects that cannot be mitigated to an acceptable level.

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

Additional Comments

There's more options to decide upon such as wave energy or solar energy.

We live in an area reliant on tourism and the fishing industry.
Tourism would be disrupted if the view they see is not one of nature's beauty but manmade infrastructure.
Livelihoods would decline and suffer.

Nature itself would suffer from the impact of the wind farm and the tonnes of concrete

used as well as the changes to the sea floor when building the structure.

Our environment is at threat already without making it worse.

You would be helping the environment on one way, one aspect of a possible solution.

But, by using this solution you're detrimentally impacting the environment ten fold more.

Choose a different option. One that aids the environment but not by destroying it in the process

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 686B0584

Member of the public 1995

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a review of the Environmental Impact Assessment Report and its accompanying documents, highlighting material deficiencies in planning, environmental considerations, cultural impacts, and procedural adherence. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns surrounding the scale, proximity, and design of the proposal raise fundamental questions regarding its alignment with statutory requirements, national policy, and the principles underpinning sustainable development.

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The application lacks a thorough assessment of marine ecology and protected species, which is crucial for understanding the ecological receptors in the West Lewis coastal area. This region is known for its sensitivity and biological activity, yet the baseline data remains incomplete. The methods used have not effectively captured important details about species presence, behaviour, and habitat usage. Consequently, the assessment fails to provide a solid evidential basis to evaluate the potential impacts.

One significant oversight is the failure to appropriately acknowledge the presence of otters, which are protected under European law. The application does not adequately assess their use of coastal areas for foraging and movement. There is insufficient consideration of their core foraging range and behavioural patterns, leading to an inadequate assessment of potential impacts from construction disturbance, noise, and increased activity. This lack of information undermines any claims of no significant effects on otters.

Additionally, the assessment of basking sharks shows shortcomings, as the reliance on aerial surveys creates a significant detection bias, particularly under Atlantic weather conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent use of these waters. Ignoring or inadequately considering this data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings mean that claims of negligible or non-significant effects stem from assumptions rather than strong evidence. Without sufficient baseline data, it becomes impossible to assess cumulative and indirect impacts meaningfully, including seasonal variations and broader ecosystem interactions. This situation leads to uncertainty regarding the actual risk faced by marine species and habitats.

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

Overall, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These issues hinder a thorough evaluation of impacts on marine ecology and protected species and contribute to the conclusion that the application lacks a solid evidential foundation.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the cultural heritage and community identity associated with the proposed development is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are interconnected. This application adopts a reductive perspective, viewing heritage merely as a collection of isolated, static assets and neglecting their

ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming of the assessment is its treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices, yet they are categorised as static features in the assessment. This oversight neglects their continued significance and the potential impacts of development on their surroundings, leading to an incomplete evaluation of the cultural effects and disregarding their importance in community life.

Moreover, the assessment overlooks intangible cultural heritage, particularly the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are vital to the area's identity but are entirely absent from the evaluation, representing a considerable omission. The failure to consider such factors hinders a comprehensive understanding of the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity recognised as characteristic of an Indigenous People, yet there has been no process for Free, Prior and Informed Consent. This lack of meaningful engagement diminishes the legitimacy of the assessment and fails to adhere to established principles of participation in decisions affecting cultural and environmental interests.

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

From a policy standpoint, the noted deficiencies place the proposal in direct opposition to National Planning Framework 4, particularly concerning the protection of historic assets and locations. The failure to account for both tangible and intangible heritage, as well as to recognise living cultural practices, constitutes a clear deviation from policy requirements.

In summation, the combined failures to assess living heritage, intangible cultural value, community rights, and statutory obligations result in a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application does not furnish a sufficient foundation for understanding the true cultural costs associated with 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 means that both the public and the competent authority cannot grasp the complete scope of social risks identified through the developer's own research. Available

summaries suggest that residents are facing 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 based on actual experiences rather than speculation. However, without access to the full assessment, proper scrutiny of these findings is hindered, limiting the ability to evaluate their importance in the decision-making process.

Furthermore, the proposal is seen as a threat to community identity and cohesion, with the developer's own findings highlighting concerns about "cultural loss." Despite this, such impacts have not been fully considered in the main application or given adequate weight. The withholding of the complete Social Impact Assessment obscures the true human and social costs of the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning may be at stake. By failing to provide the complete dataset, the application lacks a solid evidential basis for balancing benefits against harm.

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

The procedural implications are serious. The competent authority cannot carry out a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a significant omission within the application and fails to meet the evidential requirements of the Environmental Impact Assessment regime.

Overall, the non-disclosure of the complete Social Impact Assessment, along with evidence of existing negative impacts, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal to introduce large-scale turbines close to the West Lewis coastline poses a significant threat to the area's natural landscape and cultural heritage. This region is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. The addition of such industrial structures would create a persistent and overwhelming presence that would irrevocably change this character, leading to a permanent alteration of the landscape.

The assessment presented within the application does not adequately reflect the magnitude of the visual changes that would occur. Given their scale and proximity, the

turbines would dominate the views from residential areas, historic sites, and popular coastal locations, adversely affecting visual amenity and undermining the essential qualities of naturalness and remoteness. The report fails to convey the true extent of this impact or its significance, particularly within the context of such a sensitive environment.

There are serious methodological issues regarding the selection and representation of visual viewpoints in the assessment. It appears that the chosen viewpoints may not fully represent the most sensitive receptors or potential worst-case scenarios, especially concerning vital cultural heritage sites and high-value landscapes. This raises concerns that the actual magnitude of visual impact has been downplayed, which undermines the credibility of the assessment.

Moreover, the assessment neglects the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape connected by visual and spatial relationships to the Atlantic horizon. Instead of recognising this interdependence, the assessment treats these assets as isolated, resulting in an incomplete consideration of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, fundamentally altering how heritage assets are perceived and diminishing their connection to the natural horizon. This situation presents not only a visual impact but also a broader cultural and spatial harm that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly concerning the preservation of natural places and historic assets. The anticipated scale of change is incompatible with the need to protect landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a thorough worst-case assessment undermines any assertion of compliance with policy guidelines.

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

In summary, the assessment fails to accurately represent the extent of the impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the safeguarding of this vital landscape.

CONSTRUCTION AND POLLUTION RISKS

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

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

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The offshore turbines and onshore works are interconnected, yet the assessment treats them separately. This fragmented approach fails to capture the overall environmental and socio-economic effects of what is a single integrated project.

Onshore elements involve cabling across protected moorland, the construction of a substation near Stornoway, and the creation of access infrastructure through sensitive landscapes. These activities entail excavation across areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The application does not adequately assess these impacts, limiting the understanding of the project's total environmental footprint.

By excluding or postponing the assessment of onshore impacts, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered together, yet the separation leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

There are notable risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application fails to show that these impacts have been thoroughly assessed or that suitable avoidance measures have been implemented. This creates a significant evidential gap regarding biodiversity protection.

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

Furthermore, routing infrastructure through active croft land may conflict with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, prompting questions about deliverability and lawful execution.

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

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

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.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm indicates a significant shortfall in meeting the principles of sustainable development as outlined by statutory duties and national policy. It echoes the key issues that led to the rejection of the Lewis Wind Power proposal in 2008, wherein the level of industrialisation was deemed unacceptable. This current application is presented under a more robust policy framework that emphasises biodiversity, peatland conservation, landscape integrity, and community wellbeing.

There are substantial gaps in the evidential basis provided for the proposal. Notably, there is a reliance on an undefined design envelope, incomplete baseline data, unspecified mitigation measures, and key impact pathways that have been overlooked, such as those concerning nocturnal wildlife, the entirety of the onshore infrastructure, and the effects on tourism. This leads to an Environmental Impact Assessment that is insufficient, failing to offer a comprehensive understanding of the potential significant effects or residual impacts.

Furthermore, the proposal displays evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment violates statutory obligations set forth by the Islands (Scotland) Act 2018. Additionally, the omission of a complete Social Impact Assessment is a significant deficiency. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

The proposal is at odds with the National Planning Framework 4, as it does not adequately demonstrate the protection of biodiversity, natural habitats, and cultural heritage. It fails to establish that the health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact analysis. Furthermore, the cumulative effects of both offshore and onshore components have not been thoroughly evaluated, which clouds the understanding of impacts on peatlands, carbon balance, habitats, and agricultural land.

Uncertainties surrounding environmental risks remain, with incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals, which in some aspects are inconsistent with each other. The evidence threshold necessary to discount adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and precluding a lawful determination that the impacts are acceptable.

The proposal would lead to considerable and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and the adverse effects on tourism are all permanent changes that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The multitude of information deficiencies, coupled with conflicts with policy and unresolved environmental concerns, obstruct a lawful and evidence-based decision-making process. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm be denied in its entirety.

Additional Comments

Light pollution is a huge concern as well as ruining a landscape unnecessarily. The island waters have a unique habitat that is being destroyed. The wind turbines will

dominate the landscape of the West Coast, affecting historic sights and scenic beaches having a knock on effect on tourism which is vital to the island.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 213977A6

Member of the public 1996

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment regimes. The basis of this objection arises from a review of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural integrity. The site is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns are raised about the compatibility of the proposal with statutory requirements, national policy, and the principles of sustainable development due to its scale, proximity, and design.

The application lacks a sufficient evidential foundation necessary for a lawful determination. Essential environmental data is absent, and the baseline information presented is both limited and inconsistent, with critical components of the proposal remaining undefined. The flexible design framework employed hinders a clear assessment of significant effects, while the reliance on unspecified mitigation measures prevents any evaluation of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

There exist significant policy conflicts, as the proposal seems misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and weaken the capacity of the competent authority to determine that the development meets policy acceptance.

Moreover, the magnitude of the proposal is unprecedented in this area, with large turbines positioned perilously close to the shoreline, raising serious issues regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and unfit for a lawful determination. Under these conditions, it is imperative that the precautionary principle is invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a complete, clear, or dependable account of the likely environmental impacts associated with the proposal. The incorporation of a flexible Project Design Envelope, which lacks specific turbine dimensions, layouts, or configurations, creates substantial uncertainty and hinders the consistent application of a worst-case scenario analysis. This compromises the assessment's integrity, resulting in impacts that may not accurately represent the development that will ultimately be constructed. Consequently, both the public and the competent authority are left without a true understanding of the environmental implications.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. As a result, consent is sought with the expectation that environmental harm will be mitigated later, obstructing any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information until after consent is granted is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures be thoroughly established before determination.

There are notable evidential inadequacies, including a lack of baseline data, methodological limitations, and a dependence on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, particularly where negligible or non-significant effects are concluded without substantial supporting data. The deficiency of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be aligned with statutory obligations.

As a result, the application does not meet the evidential standard set by the Habitats Regulations to rule out 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, particularly the requirements related to biodiversity protection and environmental integrity, as it does not provide evidence that impacts have been fully assessed or that suitable safeguards are implemented.

In summary, the reliance on an undefined design envelope, the lack of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These issues hinder a lawful and rigorous assessment of environmental effects, meaning that the competent authority is not positioned to make a determination based on the information supplied.

ASSESSMENT OF ALTERNATIVES

The proposed development fails to adequately assess alternatives, which does not align with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured comparison of feasible alternatives based on their environmental impacts, the application presents a narrative of the project's evolution.

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

A notable lack of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations exists. Specifically, the application does not indicate that the developer has thoroughly considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. Considering the sensitivity of the West Lewis coastline, as well as the significance of proximity to shore in assessing impact, this lack of analysis hinders the ability to conclude that the proposed siting is the least damaging option.

Moreover, the shortcomings are evident in the assessments of cable routing and landfall, where there is inadequate evidence to suggest that alternative routes have been properly examined to avoid or lessen effects on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The failure to provide a clear avoidance strategy and the absence of comparative analysis illustrate that mitigation by design has not been incorporated, leading to an overreliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This indicates a failure to adhere to the established mitigation hierarchy, which obstructs the competent authority's ability to ascertain whether more suitable and less harmful alternatives exist. Without a thorough alternatives assessment, it cannot be established that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, these deficiencies detract from compliance with National Planning Framework 4, especially concerning the protection of natural spaces, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant oversight that leads to the conclusion that the application has not undergone sufficient evaluation and cannot justifiably support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

conclusions drawn regarding the absence of significant effects on this species.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to demonstrate that internationally important seabird populations will not be adversely affected, particularly in light of the west coast of the Isle of Lewis supporting many species already in decline. The assessment is materially flawed, presenting significant gaps in evidence and internal inconsistencies that undermine its conclusions. It does not adequately evaluate the implications of displacement, collision risk, or habitat loss, particularly within key foraging areas and migratory pathways.

A key contradiction exists, as the developer claims no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious concerns regarding the reliability of the assessment and suggests that the conclusions presented lack support from the underlying evidence. The application neglects to provide sufficient evidence that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected, failing to fully account for the importance of these feeding grounds. Additionally, the reliance on modelling approaches introduces uncertainty, particularly for species experiencing severe declines, like Kittiwakes and

Fulmars, and is likely to underestimate mortality rates, especially where baseline data is lacking and behavioural responses are poorly understood.

The siting of turbines within a recognised migratory corridor adds a significant risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not adequately address the long-term implications of sustained mortality within this corridor or the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been reached. This situation engages the precautionary principle and precludes a lawful conclusion in support of consent. Moreover, the identified deficiencies indicate a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed application is fundamentally flawed in its assessment of cultural heritage and community identity, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interwoven. The evaluation adopts a simplistic view, treating heritage merely as a collection of isolated, static assets and neglecting their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practices, yet the assessment mistakenly categorises them as static features, disregarding their continued use and meaning as well as the impact of development on their surroundings. This mischaracterisation leads to an incomplete understanding of cultural effects and overlooks their integral role in community life.

Moreover, the assessment neglects intangible cultural heritage, such as the Gaelic language, traditions, and the longstanding relationship the community maintains with the coastal environment. These factors are vital to the area's identity and are not addressed in the assessment, representing a significant oversight. The cultural impact of the development, therefore, cannot be comprehensively evaluated without consideration of these elements.

There are also serious concerns regarding community rights and engagement. The

Gaelic-speaking population is recognised as having a distinct cultural identity characteristic of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement diminishes the legitimacy of the assessment and contravenes established principles of participation regarding decisions that affect cultural and environmental interests.

A major procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone precludes a lawful determination of the application.

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

Overall, the lack of assessment regarding living heritage, intangible cultural value, community rights, and compliance with statutory obligations results in a substantial evidential gap. The cultural impacts of the development remain inadequately assessed, and the application does not furnish a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing associated with the proposal is critically flawed and lacks the necessary transparency for a legally sound assessment. Although the developer undertook a Social Impact Assessment that included focus groups with local residents, the comprehensive report remains unpublished. This lack of availability creates a significant evidential gap, inhibiting both public scrutiny and the competent authority's understanding of the full range of social risks identified in the developer's research.

Available summaries reveal that residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These documented impacts stem from direct community engagement and are therefore grounded in reality, not conjecture. Nevertheless, the absence of the full assessment restricts proper examination of these findings and hampers the determination of their relevance in the decision-making framework.

Furthermore, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with the developer's findings noting "cultural loss." Despite this, such impacts have not been adequately incorporated into the main application nor afforded the appropriate consideration. By withholding the complete Social Impact Assessment, the developer 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. A thorough understanding of the social, economic, and health implications is essential for projects of this magnitude, especially where community identity and functionality may be at risk. The failure to provide the complete data set undermines the application, leaving it without a robust evidential foundation for evaluating the balance between benefits and detriments.

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, yet the evidence currently available suggests the existence of adverse effects that have not been fully acknowledged. Without the complete assessment, it is impossible to establish compliance with this policy.

The procedural consequences are considerable, as the competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a significant omission in the application and signifies a failure to satisfy the evidential obligations of the Environmental Impact Assessment framework.

In conclusion, the combination of the non-disclosure of the complete Social Impact Assessment and the evidence of existing adverse impacts leads to an incomplete and unreliable evaluation. This scenario precludes a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment concerning seascape, landscape, and visual impacts is significantly lacking. It does not capture the extent of change or the sensitivity of the environment surrounding the West Lewis coastline. This area is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The placement of large-scale turbines near the shoreline would result in a continuous industrial presence, fundamentally changing this character and causing a permanent transformation of the landscape.

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

Methodological issues also arise concerning the choice and presentation of visual viewpoints. It appears that these viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises concerns that the scale of visual impact has been understated, which undermines the reliability of the assessment.

Additionally, there is a failure to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. Instead of acknowledging their interdependence, the assessment treats these as separate entities, leading to an incomplete analysis of impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 concerning the safeguarding of natural places and historic assets. The scale of change is at odds with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertions of compliance with policy.

Moreover, it is evident that the identified impacts cannot be mitigated effectively. Given the scale, height, and proximity of the turbines, their presence would be both dominant and unavoidable. Consequently, the resulting change would be fundamental and permanent, rather than reducible 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 reliable evaluation and reinforce the conclusion that the proposal is inconsistent with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is home to clean coastal waters and important habitats that are particularly vulnerable to sediment disturbance and contamination. The proposal involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete, lacking the necessary detail to evaluate potential environmental effects.

The application does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on unspecified mitigation and contingency measures to be prepared after consent, which hinders any meaningful assessment of their adequacy or effectiveness. This reliance on undefined future measures is troubling, especially given the sensitive nature of the receiving environment.

There are acknowledged risks such as sediment mobilisation and accidental chemical or oil spills, but the application fails to offer sufficient detail on how these risks will be prevented, controlled, or monitored. Furthermore, there is uncertainty regarding the

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

The absence of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent phase, the application impedes the assessment of whether appropriate safeguards are in place to manage pollution events. This introduces procedural risk and undermines the capacity of the competent authority to evaluate environmental protection measures during the determination process.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and the related mitigation must be evaluated prior to consent; without such information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application under review fails to adequately protect or maintain these vital uses and habitats without significant disruption. A fundamental concern is the assertion that fishing activity can be displaced without consequences. The application lacks evidence to confirm that alternative fishing grounds are available, accessible, or able to support additional pressure. This is a crucial oversight, as displacement poses the risk of overfishing in other areas and could lead to adverse economic repercussions for the local fishing fleet. The impacts on fisheries and the livelihoods dependent on them cannot be accurately assessed in the absence of a clear and evidence-based evaluation.

The proposal also presents notable risks to marine species, particularly due to underwater noise generated during construction activities. The anticipated high-energy hammer piling over an extended duration is expected to disturb marine life across considerable distances, adversely affecting species such as dolphins. The potential disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns. Nonetheless, the application minimises the significance of these effects without adequate supporting evidence.

In addition, there is a discernible inconsistency within the application concerning the acknowledgment of the need for licences to permit harm to European Protected Species while simultaneously describing the anticipated impacts as negligible. This contradiction calls into question the credibility of the assessment and raises significant concerns regarding compliance with the Habitats Regulations, particularly when harm is anticipated to such a degree that it necessitates legal authorisation.

Furthermore, the assessment does not adequately consider cumulative impacts resulting from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it remains impossible to ascertain the overall impact on marine ecosystems and the socio-economic conditions that rely on them.

From a policy standpoint, the application fails to demonstrate alignment with 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 avoid unacceptable impacts on marine biodiversity, thereby obstructing any conclusion that the proposal reflects sustainable development.

Overall, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies contribute to an assessment that is incomplete and unreliable. These deficiencies hinder a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is significantly lacking and does not adequately account for the full range of impacts from what constitutes a single integrated project. The offshore turbines and the onshore works are fundamentally interconnected; however, their separate assessments lead to a disjointed evaluation, obscuring the true magnitude of environmental and socio-economic consequences.

Key onshore components entail cabling across protected moorland, the construction of a substation near Stornoway, and the development of associated access infrastructure through sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive area. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

The lack of consideration for onshore impacts obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be reviewed together. The disjointed evaluation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not fully realised. There are considerable risks to sensitive habitats, including machair systems and peatland environments, which benefit from policy protection. The application does not sufficiently demonstrate that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have

been considered, creating a significant evidential void regarding biodiversity protection.

Concerns also arise regarding carbon balance, as the disturbance of peatland can lead to the release of stored carbon, potentially resulting in a carbon debt that undermines the objectives of renewable energy development. This issue has not been adequately addressed by the application, nor has it been shown that the overall carbon balance remains advantageous. Furthermore, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence that the requisite consents or processes have been initiated, raising doubts about deliverability and lawful implementation.

From a policy standpoint, the failure to evaluate the project in its entirety and to demonstrate protection of peatlands, habitats, and land use interests is inconsistent with the National Marine Plan and the National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application. Collectively, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this portion of the application incomplete and unreliable, thus obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to include any evaluation of dark skies and nocturnal wildlife, which represents a significant omission. The coastline of West Lewis is known for its exceptionally dark skies, an essential aspect of its environmental quality, cultural identity, and tourism potential. The proposed development introduces permanent red aviation lighting that is visible over extensive distances, resulting in a continuous and intrusive “wall of light” effect on the western horizon that would drastically change the night-time environment.

There is no consideration of how this lighting would impact visual amenity, landscape character, or the experiences of both residents and visitors. This lack of assessment is particularly concerning given the significance of dark skies to the area's identity and the emerging tourism sector focused on astro-tourism. The failure to address these factors highlights a clear gap in the overall landscape and environmental assessment.

Moreover, the application neglects to evaluate the impacts of this lighting on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can result in disorientation and a higher risk of collisions. Without a dedicated lighting impact assessment or phototaxis study, the application does not assess how the proposed aviation lighting could affect these species or potentially increase their mortality rates.

This issue is exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to capture nocturnal activities and associated risks. Kittiwakes, for example, may forage or migrate at night and are susceptible to

disorientation from artificial lighting; however, this risk has not been evaluated. The absence of site-specific night-time data creates a significant gap in understanding the ecological impacts of the proposal.

Without a thorough assessment of nocturnal impacts, it remains unclear whether protected species or designated sites may face adverse effects. The evidential standard necessary to eliminate adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering lawful determination.

From a policy standpoint, this omission contravenes the National Planning Framework 4, which emphasises the protection of natural places and environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the night-time character is a vital component of the environment.

In summary, the absence of any assessment regarding dark skies and nocturnal wildlife represents a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and 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 Spiorad na Mara Offshore Wind Farm proposal fails to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application echoes the significant issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Currently, it is being submitted under a policy framework that emphasizes biodiversity, peatland conservation, landscape integrity, and community wellbeing more strongly.

The application lacks a comprehensive and reliable evidential basis, revealing critical gaps in baseline data, the persistent use of an unspecified design envelope, and an over-reliance on mitigation measures that are not clearly defined. Key impact pathways, such as those concerning nocturnal wildlife, complete onshore infrastructure, and tourism effects, are omitted. Consequently, the Environmental Impact Assessment is insufficient, failing to provide a thorough understanding of likely significant effects or residual impacts.

There are notable procedural shortcomings as well. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory obligations under the Islands (Scotland) Act 2018. Moreover, the non-disclosure of the full Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Furthermore, the proposal contradicts the National Planning Framework 4, as it does not demonstrate adequate protection of biodiversity, natural environments, and cultural heritage. It fails to show that health and wellbeing impacts are acceptable, and it cannot substantiate 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, clouding the assessment of impacts on peatlands, carbon

balance, habitats, and crofting land.

The environmental risks associated with the proposal remain ambiguous and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some respects, inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, necessitating the application of the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

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

In summary, the application is both procedurally and substantively inadequate for determination. The significant information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstruct any lawful, evidence-based decision. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm application be refused entirely.

Additional Comments

I object to this unnecessary industrialisation of the Scots countryside!

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: 5490185B

Member of the public 1997

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The proposal raises significant concerns, particularly regarding its compatibility with statutory requirements, national policy, and sustainable development principles. It 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.

A critical issue with the application is its lack of an adequate evidential basis for lawful determination. The Environmental Impact Assessment Report and accompanying documents show that essential environmental data is missing, baseline information is limited and inconsistent, and important aspects of the proposal remain undefined. The flexible design framework employed prevents a clear understanding of the likely significant effects. Furthermore, the reliance on unspecified mitigation measures means that their effectiveness cannot be properly assessed. Consequently, the documentation does not allow for a full understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

There are substantial policy conflicts evident in the application. 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 proposal fails to demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts directly undermine the statutory tests necessary for consent and jeopardise the ability of the competent authority to deem the development acceptable in policy terms.

The unprecedented scale of the proposal introduces additional concerns, with large turbines positioned close to the shoreline raising issues related to landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policy guidelines demonstrates that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle must be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of the marine ecology and protected species is inadequate and fails to provide a reliable understanding of the ecological receptors in the West Lewis coastal

environment. This area is biologically active and sensitive, yet the baseline data is lacking, and the methodologies used do not capture the presence, behaviour, and habitat use of species effectively. Consequently, the assessment does not provide a solid evidential basis for evaluating potential impacts.

One significant oversight is the assessment of otters, a European Protected Species. The application does not adequately recognise and assess their active use of the coastal areas for foraging and movement. Without considering their core foraging range and behavioural patterns, the potential impacts of construction disturbance, noise, and increased activity have not been fully evaluated. This shortcoming undermines conclusions regarding the absence of significant effects on this species.

Furthermore, there are deficiencies in the assessment of basking sharks due to reliance on aerial surveys, which introduce considerable detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that show these waters are frequently used by the species. The failure to include or properly consider such data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological flaws result in conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This leads to uncertainty regarding the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment requirements or the National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt and necessitates the application of the precautionary principle. In light of this, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

considers the potential consequences of displacement, collision risk, or habitat loss.

A significant contradiction is evident, as the developer asserts that no significant adverse effects will occur, while also advancing a Habitats Regulations derogation case, which is only warranted in situations where significant harm is anticipated. This inconsistency casts doubt on the assessment's reliability and suggests that its conclusions are not substantiated by adequate evidence. Furthermore, the assessment does not convincingly show that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not thoroughly evaluated, and the reliance on modelling techniques introduces a level of uncertainty, particularly for declining species such as Kittiwakes and Fulmars. The methodologies utilised may underestimate mortality rates, especially given incomplete baseline data and insufficient understanding of behavioural responses.

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The application presents significant procedural implications due to the non-disclosure of the complete Social Impact Assessment. This omission prevents the competent authority from conducting a thorough socio-economic and health evaluation, which is essential for compliance with the evidential requirements of the Environmental Impact Assessment regime.

Furthermore, the assessment of health, social impacts, and wellbeing is significantly

deficient, lacking the necessary transparency for a lawful evaluation. Although the developer engaged local residents through focus groups as part of the Social Impact Assessment, the full report remains unpublished. This represents a critical evidential gap, obstructing both public understanding and the competent authority's grasp of the social risks identified by the developer's own research.

Available summaries reveal that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement with the community and are thus not speculative. Nevertheless, the absence of the full assessment limits the potential for proper scrutiny of these findings, making it challenging to ascertain their significance in the decision-making process.

Moreover, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, the application has not fully integrated these impacts or afforded them appropriate weight, thereby obscuring the true human and social costs associated with the development.

The lack of transparency in disclosing the full dataset undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is paramount for developments of this magnitude, particularly when community character and functioning may be at stake.

From a policy perspective, the application fails to demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. While development should promote positive health outcomes and avoid harm, available evidence indicates pre-existing adverse effects that remain undisclosed. Therefore, without the complete assessment, adherence to this policy cannot be adequately evidenced.

Taken together, the non-disclosure of the complete Social Impact Assessment, alongside existing evidence of adverse impacts, renders the assessment incomplete and unreliable. This situation precludes a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

CONSTRUCTION AND POLLUTION RISKS

The proposal for substantial seabed preparation and installation works presents significant concerns, particularly due to the incomplete assessment of construction and pollution risks. The high-energy Atlantic environment along the West Lewis coastline, known for its clean coastal waters and important habitats, is at risk from sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. This absence prevents a thorough evaluation of the adequacy and effectiveness of the proposed mitigation and contingency measures, which are deferred to a post-consent stage.

The reliance on undefined future measures is alarming given the sensitivity of the surrounding environment. There is notable 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 extends to potential repercussions on marine species and habitats identified as sensitive in broader assessments.

Moreover, the lack of detailed emergency response procedures exacerbates these concerns. 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 procedural risk hinders the competent authority's capacity to assess environmental protection measures at the point of determination.

Regulatory requirements stipulate that likely significant effects and necessary mitigation must be assessed before consent is granted. The deferral of essential environmental safeguards directly conflicts with the Environmental Impact Assessment regime. The application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality. Collectively, the absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts render the assessment materially deficient, further affirming the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. The assessment of fisheries and marine life provided by the application is insufficient and does not adequately evaluate the ecological or socio-economic impacts. A crucial issue is the assumption that fishing activity can be displaced without consequence. The application lacks evidence that alternative fishing grounds are available and accessible, which raises concerns about the risk of overfishing and the potential economic ramifications for the local fishing fleet. The absence of a clear, evidence-based assessment hinders a proper understanding of the impacts on fisheries and livelihoods.

Additionally, the proposal poses significant risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling planned for an extended period is expected to cause disturbances over large distances, potentially affecting marine species such as dolphins. The predicted disruption to a significant portion of the local bottlenose dolphin population is alarming, yet the application tends to downplay these effects without sufficient evidence to support such minimisation.

Moreover, the application acknowledges the need for licences to permit harm to European Protected Species, while simultaneously describing the impacts as

negligible. This inconsistency undermines the credibility of the assessment and raises doubts regarding compliance with the Habitats Regulations, especially where anticipated harm is significant enough to require legal authorisation.

Cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activity, are not adequately addressed in the assessment. 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 does not demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the development can coexist with existing marine users and avoid unacceptable impacts on marine biodiversity, thereby precluding any assertion that the proposal constitutes sustainable development.

Overall, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions make the assessment incomplete and unreliable. These shortcomings prevent a robust evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and does not capture the full range of impacts from what is effectively a single integrated project. The offshore turbines and onshore works are inherently interconnected, yet their separate assessments lead to a fragmented understanding that clouds the true extent of the environmental and socio-economic consequences.

Onshore elements encompass cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, especially within Barvas Moor, a vital carbon store and ecologically important habitat. Without a thorough evaluation of these impacts, it is impossible to grasp the overall environmental footprint of the project.

By neglecting to assess the onshore impacts or postponing that evaluation, the application hampers the analysis of cumulative effects. The Environmental Impact Assessment process demands that all aspects of a project be reviewed in tandem, yet the disjointed examination of offshore and onshore components obscures the combined impacts on peatlands, habitats, and local communities.

Furthermore, there are serious risks to sensitive habitats, including machair systems and peatland areas, which are protected by policy. The application fails to demonstrate that the impacts on these habitats have been thoroughly evaluated or that effective avoidance measures have been implemented. This results in a significant evidential gap regarding biodiversity protection.

Concerns also arise about the carbon balance associated with the proposal. Disturbance of peatland releases stored carbon, potentially incurring a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this matter or prove that the overall carbon balance remains favourable.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is no evidence that the necessary consents or processes have been initiated, which brings into question the deliverability and lawful implementation of the project.

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

The combination of separating project components, the lack of a thorough assessment, and insufficient evidence regarding environmental and land use impacts makes this part of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment regarding dark skies and nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in defining environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that would be visible over long distances, creating a continuous and intrusive "wall of light" effect on the western horizon. This change would fundamentally alter the night-time environment.

The application lacks a thorough evaluation of how this lighting might impact visual amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly concerning given the significance of dark skies to the area's identity and the growing tourism sector focused on astro-tourism. The absence of these considerations results in a notable deficiency in the overall landscape and environmental evaluation.

Moreover, there has been no assessment of the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to the effects of artificial lighting due to phototaxis, which can result in disorientation and a heightened risk of collision. The application fails to include any form of lighting impact assessment or phototaxis study, neglecting to examine how aviation lighting may influence these species or contribute to increased mortality.

This lack of evaluation is exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to capture nocturnal activity or its associated

risks. Kittiwakes, which may forage or migrate at night, are similarly at risk of disorientation due to artificial lighting, yet this potential hazard has not been assessed. The absence of site-specific night-time data creates a substantial void in understanding ecological impacts.

Without a comprehensive assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard required to eliminate adverse effects beyond reasonable scientific doubt is not met, thereby invoking the precautionary principle and hindering a lawful determination.

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

Overall, the lack of any assessment regarding dark skies and nocturnal wildlife constitutes a considerable evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and incapable of facilitating a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development when evaluated against statutory obligations, national policies, and evidential standards. The application revisits core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new proposal is being considered under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis provided for the determination of this application. Critical gaps in baseline data exist, alongside the continued use of an undefined design envelope, reliance on unspecified mitigation measures, and the exclusion of essential impact pathways, including effects on nocturnal wildlife, comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, preventing a thorough understanding of the likely significant effects or any residual impacts.

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

The proposal contradicts the National Planning Framework 4 by failing to demonstrate

the protection of biodiversity, natural spaces, and cultural heritage. It does not adequately address health and wellbeing impacts and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. Additionally, the cumulative effects of both offshore and onshore components have not been appropriately assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertain and potentially significant environmental risks persist, as 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 remains unmet, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

The site for the proposed wind farm is poorly chosen. The harm it would have to marine life is not worth the benefits. The untouched view westwards from the Westside should stay as it is, unpolluted.

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: 2ED9D985

Member of the public 1998

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 procedures. A thorough review of the Environmental Impact Assessment Report and accompanying materials reveals significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west coast of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns arise regarding the compatibility of the project's scale, proximity, and design with statutory requirements, national policy, and sustainable development principles.

The application lacks a robust evidential basis necessary for a lawful determination. Essential environmental data is missing, baseline information is either limited or inconsistent, and crucial components of the proposal remain undefined. The adoption of a flexible design framework complicates the assessment of likely significant effects, and the reliance on unspecified mitigation measures hampers the evaluation of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive or informed perspective on the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by credible evidence.

There are evident and substantial conflicts with existing policies. The proposal is at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts are critical as they directly pertain to the statutory tests required for consent and challenge the ability of the competent authority to ascertain the development's acceptability from a policy standpoint.

The scale of this proposal is unprecedented for the area, with large turbines sited in close proximity to the shoreline, raising significant concerns about landscape capacity, visual impact, and environmental consequences. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy violations highlight that the application is incomplete and unable to facilitate a lawful determination. In light of these factors, the precautionary principle must be applied.

ASSESSMENT OF ALTERNATIVES

The application lacks a comprehensive evaluation of alternatives, failing to meet the requirements set by the Environmental Impact Assessment regime. Instead of offering a structured comparison of feasible options based on their environmental impacts, it merely narrates the evolution of the project. This narrative does not sufficiently demonstrate that less harmful alternatives have been duly identified, assessed, and chosen over more detrimental solutions.

There is an evident absence of transparent, evidence-based comparisons regarding different offshore locations, scales of development, or design configurations. Notably, the application does not indicate that the developer has genuinely considered placing the turbines further offshore, where potential visual, ecological, and coastal impacts could be lessened. The West Lewis coastline is particularly sensitive, and the critical significance of proximity to shore in gauging impact highlights the inadequacy of the analysis presented, as it precludes any conclusion that the proposed site is the least harmful option.

The shortcomings are also apparent in the evaluation of cable routing and landfall assessments, where there is inadequate evidence that alternative routes have been thoroughly examined to mitigate impacts on sensitive receptors, including culturally significant areas like Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis suggest that the design has not incorporated effective mitigation, instead relying on measures that would be applied after the design phase.

Consequently, the application fails to prove that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This oversight represents a departure from the established mitigation hierarchy, inhibiting the competent authority's ability to ascertain whether there are less harmful and more suitable alternatives. Without a thorough assessment of alternatives, it is impossible to conclude that the proposal aligns with sustainable and policy-compliant practices.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, particularly regarding the protection of natural landscapes, cultural heritage, and community wellbeing. The failure to conduct a structured and comparative assessment is a significant oversight that reinforces the overall assessment that the application has not undergone adequate scrutiny and cannot sustain a lawful determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks adequate assessment of social impacts, health, and wellbeing, which is crucial for lawful evaluation. The developer initiated a Social Impact Assessment that included focus groups with local residents, yet the full report has not been made public. This creates a significant gap in evidence and hinders both the public and the competent authority from fully understanding the social risks highlighted in the developer's own research.

Available summaries show 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, not speculation. However, the lack of access to the complete assessment hampers proper scrutiny and limits the ability to assess their importance in the decision-making process.

Evidence also suggests that the proposal is seen as a direct threat to community identity and cohesion, with the developer's findings indicating potential "cultural loss." Nevertheless, these impacts have not been adequately incorporated into the main application or given appropriate consideration. The withholding of the full Social Impact Assessment clouds the understanding of the true human and social costs associated with the development.

This lack of transparency affects the Environmental Impact Assessment process. Understanding social, economic, and health impacts is vital for developments of this magnitude, especially when community character and functionality may be at stake. The application fails to provide a complete evidential basis needed to weigh the benefits against potential harm.

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

The procedural consequences are significant. The competent authority is unable to perform a thorough socio-economic and health evaluation without the full Social Impact Assessment. This omission represents a material flaw in the application and does not meet the evidential standards required under the Environmental Impact Assessment regime.

Collectively, the failure to disclose the full Social Impact Assessment, along with evidence of existing negative impacts, leads to an incomplete and unreliable assessment. This hinders a lawful determination and reinforces the conclusion that the application lacks sufficient information for proper consideration.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the impacts on seascape, landscape, and visual characteristics is fundamentally inadequate, failing to accurately capture the extent of change or the sensitivity of the environment. The character of the West Lewis coastline is marked by its unspoiled Atlantic horizon and a pronounced sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the coastline would establish a continuous industrial presence, fundamentally transforming this unique character and leading to a permanent alteration of the landscape.

There are significant shortcomings in how the visual impacts have been represented.

The scale and closeness of the turbines would dominate views from residential areas, historic sites, and well-frequented coastal locations, adversely affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The evaluation does not adequately communicate this impact or its significance within the context of such a sensitive landscape.

Moreover, methodological issues arise from the choice and portrayal of visual viewpoints. Evidence indicates that the selected viewpoints may not sufficiently represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage locations and high-value landscapes. This lack of comprehensive representation raises concerns that the visual impact may have been minimised, thus questioning the reliability of the assessment.

A further critical omission is the failure to examine the interconnectedness of landscape, seascape, and cultural heritage. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of an integrated landscape setting that is visually and spatially connected to the Atlantic horizon. The assessment regards these assets in isolation, neglecting their interrelatedness and leading to an incomplete appraisal of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, affecting the context in which heritage sites are perceived and severing their link to the natural horizon. This not only signifies a visual impact but also inflicts broader cultural and spatial harm that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural environments and historical assets. The proposed scale of change is inconsistent with the obligation to protect landscape character, visual amenity, and the settings of culturally significant sites. The failure to conduct a thorough worst-case scenario assessment further weakens any assertions of compliance with policy requirements.

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

Overall, the assessment does not reliably portray the extent of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These deficiencies hinder an accurate evaluation and support the conclusion that the proposal is inconsistent with the preservation of this landscape.

TOURISM

The application significantly lacks a thorough assessment of tourism impacts, failing to evaluate the economic and social ramifications for a crucial sector of the Isle of Lewis economy. Given that tourism relies heavily on the region's wild coastline, near-pristine

landscapes, dark skies, and sense of remoteness, this deficiency is particularly concerning. Although the application recognises 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.

Tourism on the Isle has experienced notable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the application neglects to model the potential consequences of the industrialisation of the seascape and the resulting decline in environmental quality on Tourism Gross Value Added and overall economic resilience. In the absence of such analysis, it is impossible to ascertain whether the proposed development would result in a net economic benefit or detract from an established and flourishing sector.

The crucial role of environmental quality in supporting tourism is also overlooked, particularly regarding the significance of unspoiled landscapes and dark skies for visitor experiences, as well as the growing markets in nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, leading to a substantial gap in understanding the impacts on a recognised and expanding segment of the local economy.

For an island community with limited economic diversification, the failure to assess the impacts on tourism carries broader implications for employment, local businesses, and the sustainability of the community. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been scrutinised as stipulated under the Islands (Scotland) Act 2018.

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

In summary, the failure to quantify tourism impacts, evaluate environmental drivers of visitor behaviour, and acknowledge the island's economic dependency creates a significant evidential gap. This absence hinders a robust assessment of economic effects and contributes to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development when evaluated against statutory duties, national policy, and evidential benchmarks. This application revisits the primary concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. The current proposal emerges under a more robust policy framework that places increased

emphasis on biodiversity, peatland conservation, landscape integrity, and community wellbeing.

A thorough and reliable evidential basis for the determination of this application is not provided. There exist critical gaps in the baseline data, the use of an undefined design envelope, and a reliance on unspecified mitigation measures. Additionally, there is a significant omission of crucial impact pathways, including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment remains incomplete, hindering a full understanding of likely significant effects and residual impacts.

Furthermore, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory duty under the Islands (Scotland) Act 2018. The failure to present a complete Social Impact Assessment further represents a material omission. These shortcomings inhibit the competent authority from evaluating the impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unfit for determination.

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

Environmental risks remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain instances, inconsistent. The evidential threshold needed to rule out adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

This scheme is far closer to shore than the original proposal sitting the windfarm further to the north of the island and further out to sea. No other major offshore windfarm development off the British coast has been sited so close to land where people live.

The project should be resisted further away from the coast

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: 1A695927

Member of the public 1999

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

Dear Sir/Madam

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

The application lacks a sufficient evidential basis for a lawful decision. Essential environmental data is absent, baseline information is both limited and inconsistent, and several key elements of the proposal are not clearly defined. The employment of a flexible design framework obscures the understanding of likely significant effects, while the reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the provided documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and the claims of negligible or non-significant effects are unsupported by robust evidence.

There are substantial conflicts with existing policies. The proposal seems at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for consent and hinder the competent authority's ability to determine whether the development is acceptable from a policy standpoint.

The unprecedented scale of the proposed development in this area raises considerable concerns, particularly regarding landscape capacity, visual dominance, and environmental impact, due to the large turbines being positioned close to the shoreline. In light of the insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance, it is evident 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 within the Environmental Impact Assessment Report are substantial and undermine its reliability as a measure of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which lacks definitive commitments regarding turbine dimensions, layouts, or configurations, generates considerable uncertainty. This situation precludes a consistent application of a worst-case scenario analysis and ultimately compromises the integrity of the assessment. Consequently, the impacts presented may not accurately represent the development that will be constructed, thereby hindering both public understanding and the competent authority's ability to gauge the true extent of environmental effects.

Furthermore, the application places excessive reliance on mitigation measures, monitoring strategies, and management plans that are not yet established. Seeking consent on the premise that environmental harm will be addressed in the future obstructs any meaningful evaluation of the effectiveness of these measures or assessment of residual impacts. This postponement of essential information to post-consent stages is procedurally unacceptable and contravenes the fundamental aims of the Environmental Impact Assessment framework, which necessitates that significant effects and their mitigations are clearly defined prior to any determination.

There are also significant evidential gaps, including insufficient baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Such shortcomings create uncertainty regarding the magnitude and significance of impacts, particularly in instances where conclusions of negligible or non-significant effects are asserted without adequate supporting data. The lack of sufficient information obstructs a thorough understanding of cumulative and worst-case impacts and fosters scientific uncertainty that is incompatible with statutory requirements.

As a result, the application fails to satisfy the evidential standards mandated by the Habitats Regulations to rule out 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 the National Planning Framework 4, particularly with respect to biodiversity protection and environmental integrity, as it cannot be substantiated that impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the reliance on an unspecified design envelope, the absence of concrete mitigation measures, and the gaps in baseline data collectively render the Environmental Impact Assessment Report not only unreliable but also incomplete. These significant deficiencies impede a lawful and comprehensive assessment of environmental effects, leaving the competent authority without the necessary information to properly evaluate the application.

ASSESSMENT OF ALTERNATIVES

The application presents significant inadequacies in its assessment of alternatives, failing to meet the statutory requirements set by the Environmental Impact Assessment

regime. Rather than offering a well-structured and reasoned evaluation of realistic alternatives based on their environmental effects, it merely outlines a narrative of the project's evolution. This method does not convincingly show that less harmful options have been adequately identified, assessed, and selected over more damaging alternatives.

There is a clear lack of transparent, evidence-based comparisons among alternative offshore locations, development scales, or design configurations. Notably, the application does not provide evidence that the developer has earnestly considered placing turbines further offshore, where the visual, ecological, and coastal impacts could potentially be reduced. Given the sensitivity of the West Lewis coastline and the critical role of proximity to shore in evaluating impact, the absence of such an analysis hinders any conclusion regarding whether the proposed siting truly represents the least damaging option.

These deficiencies are also evident in the assessments related to cable routing and landfall, where insufficient evidence has been provided to show that alternative routes have been thoroughly explored in order to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis indicate that the approach to mitigation has not been designed effectively, relying instead on post-design measures.

As a result, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This signifies a failure to adhere to the established mitigation hierarchy, impeding the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. Without a thorough alternatives assessment, it cannot be concluded that the proposal meets the criteria for sustainability or aligns with policy requirements.

From a policy standpoint, these shortcomings compromise adherence to the National Planning Framework 4, particularly concerning the safeguarding of natural places, cultural heritage, and community wellbeing. The lack of a structured, comparative assessment represents 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 coastal environment of West Lewis is a highly sensitive and biologically active marine system. However, the assessment of marine ecology and protected species conducted in relation to this area is materially deficient, failing to provide a complete or reliable understanding of the ecological receptors involved. The baseline data is incomplete, and the methodologies employed do not adequately capture crucial information regarding species presence, behaviour, and habitat use. Consequently, the conclusions drawn do not rest on a sound evidential basis for evaluating potential

impacts.

Particularly concerning is the omission of otters, which are a European Protected Species. The application neglects to properly recognise and assess their active use of coastal areas for foraging and movement. This oversight in considering their core foraging range and behavioural patterns means that the potential effects of construction-related disturbance, noise, and increased activity have not been properly evaluated. As a result, the assessment's conclusions regarding the absence of significant effects on otters are undermined.

Further shortcomings arise in the evaluation of basking sharks. The reliance on aerial surveys introduces significant detection bias, especially in Atlantic conditions. This method is likely to underestimate the actual presence of these sharks, particularly when compared to established land-based observations that indicate their frequent use of these waters. The failure to incorporate or adequately consider such data leads to an incomplete baseline and undermines the reliability of the conclusions presented.

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 hinders the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the true scale of risk posed to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, exhibiting significant 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, many of which are already in decline. However, the application fails to sufficiently demonstrate that these species will not suffer adverse effects. The development site is situated within key foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss are not adequately 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, which is typically only needed when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the underlying evidence.

Moreover, the assessment lacks sufficient evidence to confirm that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these vital feeding grounds is not fully recognised, and the reliance on modelling approaches introduces uncertainty, particularly for species in steep decline like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially given incomplete baseline data and a lack of understanding of behavioural responses.

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

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

The identified deficiencies also reflect 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 directly conflicts with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The inadequacy of the assessment regarding cultural heritage and community identity cannot be overstated. It fundamentally overlooks the West Lewis coastline, which should be recognised as a dynamic cultural landscape where the interplay of environment, language, tradition, and community is essential. The application simplistically treats heritage as disconnected, static entities, ignoring their ongoing social, cultural, and spiritual relevance within the community.

Particularly concerning is the treatment of sites that hold deep cultural significance, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are not merely static features; they are active sites for burial and spiritual practice. By failing to acknowledge their continued use and meaning, the assessment provides an incomplete understanding of the cultural effects of the development, thereby neglecting their vital role in community life.

Moreover, the assessment lacks consideration for intangible cultural heritage, which encompasses the Gaelic language, traditions, and the enduring bond between the community and the coastal environment. These elements are integral to the area's identity, yet they are wholly absent from the assessment, highlighting a severe oversight. Without addressing these aspects, the true cultural impact of the development remains obscured.

Equally troubling are the concerns surrounding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity, akin to that of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This failure to engage meaningfully undermines the validity of the assessment and ignores established principles that should guide participation in matters affecting cultural and environmental interests.

Furthermore, the absence of a compliant Island Communities Impact Assessment is a critical procedural shortcoming, as mandated by the Islands (Scotland) Act 2018. The lack of this assessment hinders the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community, which alone compromises the legality of the determination.

From a policy standpoint, these shortcomings directly contradict the National Planning Framework 4, especially regarding the protection of historic assets and places. The neglect to consider both tangible and intangible heritage and the failure to recognise living cultural practices indicate a clear divergence from policy requirements.

In summation, the collective failure to address living heritage, intangible cultural value, community rights, and statutory requirements leads to a significant evidential gap. The cultural impacts of the proposed development remain inadequately assessed, and the application does not offer a sound basis for understanding the true cultural cost involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents, yet the full report remains unpublished. This significant evidential gap obstructs both the public and the competent authority from grasping the complete extent of social risks identified in the developer's own research. Available summaries indicate that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement rather than speculation, but the failure to disclose the full assessment

hampers proper scrutiny of the findings and limits the capacity to evaluate their significance in the decision-making process.

Moreover, the proposal is viewed as a direct threat to community identity and cohesion, with the developer's findings acknowledging "cultural loss." Despite this recognition, these impacts have not been adequately incorporated into the main application or assigned appropriate weight. The withholding of the full Social Impact Assessment obscures the true 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 developments of this magnitude, especially when community character and functioning may be compromised. By not providing the complete dataset, the application fails to offer a comprehensive evidential basis for evaluating the balance between benefits and 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 avoid causing harm; however, the available evidence points to existing adverse effects that have not been fully disclosed. Without access to the complete assessment, compliance with this policy cannot be verified.

The procedural implications of this situation are significant. The competent authority is unable to conduct a robust socio-economic and health evaluation without the full Social Impact Assessment, which constitutes a material omission within the application and a failure to meet the evidential requirements of 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 prevents a lawful determination and strengthens the argument that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts on the seascape, landscape, and cultural heritage is fundamentally inadequate and does not sufficiently convey the extent of change or the sensitivity of the affected environment. The coastline of West Lewis is characterised by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. The proposed installation of large-scale turbines near the shoreline would introduce a continuous industrial presence, significantly altering this character and leading to a permanent and irreversible transformation of the landscape.

Moreover, the application fails to accurately represent the scale of visual change expected. The size and proximity of the turbines would dominate views from nearby residential areas, historic sites, and frequently visited coastal locations, directly impacting visual amenity while eroding the defining qualities of naturalness and

remoteness. The assessment does not adequately convey the significance of this impact within the context of such a sensitive landscape.

Methodological issues also arise regarding the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully encompass the most sensitive receptors or the worst-case scenarios, particularly concerning significant cultural heritage sites and high-value landscapes. This presents a risk that the extent of visual impact has been underestimated, which undermines the assessment's reliability.

Furthermore, the assessment neglects the interconnected relationships between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context that is visually and spatially linked to the Atlantic horizon. By treating these assets as isolated, the assessment fails to acknowledge their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The anticipated industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their connection to the natural horizon. This results not only in a visual impact but also represents a wider cultural and spatial detriment that has not been thoroughly assessed in the proposal.

From a policy standpoint, the proposal directly contradicts the National Planning Framework 4, which seeks to protect natural environments and historic assets. The proposed scale of change is at odds with the requirements to maintain landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further weakens any assertion of compliance with policy.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their visual presence would be dominant and unavoidable. Consequently, the resulting changes are fundamental and permanent, rather than amenable to reduction through mitigation measures.

Overall, the assessment inadequately represents the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings impede a reliable evaluation, reinforcing the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal for substantial seabed preparation and installation works presents significant concerns, particularly due to the incomplete assessment of construction and pollution risks. The high-energy Atlantic environment along the West Lewis coastline, known for its clean coastal waters and important habitats, is at risk from sediment disturbance and contamination. Although the application acknowledges risks

like sediment mobilisation and accidental chemical or oil spills, it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. This absence prevents a thorough evaluation of the adequacy and effectiveness of the proposed mitigation and contingency measures, which are deferred to a post-consent stage.

The reliance on undefined future measures is alarming given the sensitivity of the surrounding environment. There is notable 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 extends to potential repercussions on marine species and habitats identified as sensitive in broader assessments.

Moreover, the lack of detailed emergency response procedures exacerbates these concerns. 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 procedural risk hinders the competent authority's capacity to assess environmental protection measures at the point of determination.

Regulatory requirements stipulate that likely significant effects and necessary mitigation must be assessed before consent is granted. The deferral of essential environmental safeguards directly conflicts with the Environmental Impact Assessment regime. The application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality. Collectively, the absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts render the assessment materially deficient, further affirming the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents a number of deficiencies regarding the assessment of fisheries and marine life, resulting in an incomplete and unreliable evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not sufficiently demonstrate that these vital uses and habitats can be protected or maintained without causing significant disruption.

A notable flaw lies in the assumption that fishing activity can be displaced without consequences. The application fails to provide any evidence indicating that alternative fishing grounds are available, accessible, or able to support the added pressure that displacement would create. This oversight is critical, as it raises concerns about potential overfishing in other areas and the possible economic ramifications for the local fishing fleet. Consequently, the impacts on fisheries and livelihoods remain inadequately understood.

The proposal also poses substantial risks to marine species due to underwater noise generated during construction activities. High-energy hammer piling, expected to occur over extended periods, is likely to cause disturbance across vast distances, particularly affecting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application minimises the importance of these effects without adequate supporting evidence.

Moreover, there exists a contradiction within the application, where the requirement for licences to allow harm to European Protected Species is acknowledged, while simultaneously claiming that the impacts are negligible. This inconsistency undermines the credibility of the assessment and raises significant questions regarding compliance with the Habitats Regulations, especially when harm is expected to a degree that necessitates legal authorisation.

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

From a policy standpoint, the application does not establish compliance with the National Planning Framework 4 or the National Marine Plan. It lacks the necessary demonstration that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby obstructing any conclusion regarding the proposal's alignment with sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and fails to fully consider the impacts of what constitutes a single integrated project. The offshore turbines and onshore works are interconnected, yet they are evaluated separately, which leads to a fragmented approach that obscures the true scale of environmental and socio-economic effects.

The application includes significant onshore components, such as cabling across protected moorland, the construction of a substation near Stornoway, and the associated 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. However, the application does not provide a thorough assessment of these impacts, which prevents a comprehensive understanding of the project's overall environmental footprint.

There are serious risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application has not demonstrated that impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This leads to a significant 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 offer evidence that the necessary consents or processes have been initiated, casting doubt on the deliverability and legality of the implementation.

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

By excluding or postponing the assessment of onshore impacts, the application fails to allow for an accurate evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered in conjunction, yet the distinct evaluation of offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities remain poorly understood.

In addition, the proposal raises alarms regarding carbon balance. The disturbance of peatland leads to the release of stored carbon, potentially resulting in a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this matter or show that the overall carbon balance is beneficial.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is markedly deficient in its evaluation of nocturnal wildlife and dark skies, which constitutes a significant omission. The coastline of West Lewis is noted for its exceptionally dark skies, integral to both environmental quality and cultural identity, as well as being a draw for tourism. The proposal intends to install permanent red aviation lighting that would be observable over considerable distances, thereby creating a persistent and intrusive "wall of light" across the western horizon, fundamentally altering the nocturnal environment.

There is no assessment of how this lighting would impact visual amenity, landscape character, or the experiences of local residents and visitors. Such an oversight is particularly significant in light of the role that dark skies play in the area's identity and

the burgeoning sector of astro-tourism. This lack of consideration introduces a clear deficiency in the comprehensive landscape and environmental evaluation.

More importantly, the proposal fails to include an evaluation of the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially susceptible to artificial lighting due to their phototactic responses, which can cause disorientation and raise the risk of collisions. There is no lighting impact assessment or phototaxis study included in the application, resulting in an inadequate evaluation of how aviation lighting may affect these species or contribute to increased mortality.

This oversight is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not adequately address nocturnal activity or related risks. Species such as Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation due to artificial lighting, yet this potential hazard has not been examined. The absence of data specific to night-time conditions creates a crucial gap in the understanding of ecological impacts.

Without a thorough assessment of nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites would face adverse impacts. The necessary evidential standard to dismiss adverse effects beyond reasonable scientific doubt cannot be achieved, thereby invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, these omissions contradict the guidelines set forth in the National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. Moreover, they undermine the overall evaluation of landscape and seascape impacts, as the character of night-time environments is an essential aspect of the overall ecological framework.

In summary, the lack of assessment concerning dark skies and nocturnal wildlife represents a substantial evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analyses render the application incomplete and inadequate for a lawful decision-making process.

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.

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: 87056807

Member of the public 2000

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. This objection arises from a thorough review of the Environmental Impact Assessment Report and supporting documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns have been raised regarding the proposal's compatibility with statutory requirements, national policy, and the principles of sustainable development, particularly given its scale, proximity to the shoreline, and design.

The application lacks an adequate evidential basis for a lawful determination. There is a notable absence of critical environmental data, while baseline information is found to be limited and inconsistent. Furthermore, key aspects of the proposal remain undefined. The application employs a flexible design framework, which obscures a clear understanding of potential significant effects. Additionally, the reliance on unspecified mitigation measures renders their effectiveness impossible to assess. Consequently, the documentation fails to provide a comprehensive or informed understanding of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence.

The proposal presents clear and substantive conflicts with established policies. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests essential for consent and undermine the capability of the competent authority to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal raises considerable concerns regarding landscape capacity, visual dominance, and overall environmental impact due to the large turbines' proximity to the shoreline. Collectively, the lack of sufficient information, dependence on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must 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.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The current assessment of cultural heritage and community identity is deeply flawed and does not recognise the West Lewis coastline as a vibrant cultural landscape. Here, the environment, language, tradition, and community are inextricably linked. Instead of appreciating the dynamic social, cultural, and spiritual roles that heritage plays, the application reduces it to mere isolated and static assets.

A significant shortcoming is evident in the treatment of culturally significant sites, such

as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites of burial and spiritual practice, but the assessment inaccurately categorises them as static features, neglecting their ongoing use, significance, and the potential impact of development on their surroundings. This mischaracterisation leads to a failure in evaluating the cultural effects and overlooks their importance in community life.

Moreover, the assessment neglects 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 yet are completely omitted from consideration, creating a substantial gap in understanding the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity associated with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and fails to adhere to established principles of participation in decisions that affect cultural and environmental interests.

A crucial procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic effects on the island community, making this omission a barrier to lawful determination.

From a policy standpoint, the identified deficiencies place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. Ignoring both tangible and intangible heritage, along with failing to acknowledge living cultural practices, represents a clear deviation from policy requirements.

Ultimately, the lack of assessment regarding 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 addressed, and the application does not furnish 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 of seascape, landscape, and visual impacts presented in the application is significantly lacking and does not truly reflect the degree of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its open Atlantic horizon, undeveloped nature, and a pronounced sense of remoteness. The proposed large-scale turbines, positioned near the shoreline, would impose a continuous and intrusive industrial presence, leading to a fundamental alteration of this character and a permanent, irreversible transformation of the landscape.

There are significant methodological flaws in the selection and representation of visual viewpoints. Current 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 raises concerns about the possibility that the visual impact has been understated, thereby casting doubt on the reliability of the assessment.

Additionally, the assessment neglects to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Key sites, such as the Calanais Standing Stones and other Scheduled Monuments, form part of a broader landscape context that is visually and spatially linked to the Atlantic horizon. The current evaluation treats these heritage assets in isolation, failing to acknowledge their interdependence and leading to an incomplete understanding of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these vital connections, altering how heritage assets are perceived and severing their ties to the natural horizon. This not only represents a visual impact but also inflicts a more extensive cultural and spatial harm that has not been adequately addressed in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly concerning the preservation of natural areas and historical assets. The level of change proposed is fundamentally incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case scenario assessment further undermines any assertion of policy compliance.

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

In summary, the assessment fails to provide an accurate representation of the scale of impact, the sensitivity of the environment, and the interconnected nature of the landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal does not align with the necessary protections for this landscape.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not provide a robust evaluation of the ecological or socio-economic impacts associated with the proposed development. This deficiency raises serious concerns regarding the ability to protect and maintain these vital uses and habitats without significant disruption.

A critical flaw in the application is the assumption that fishing activity can be displaced without negative consequences. There is no evidence presented to show that alternative fishing grounds are available or able to support additional pressure, making this omission particularly significant. The potential for displacement risks overfishing in other areas and could have broader economic ramifications for the local fishing fleet. Without a clear, evidence-based assessment, the true impacts on fisheries and livelihoods remain unclear.

Furthermore, the proposal poses substantial risks to marine species, primarily due to the underwater noise generated during construction. The anticipated high-energy hammer piling over an extended period is likely to disturb marine life over large distances, notably affecting species such as dolphins. Despite the serious implications for a significant portion of the local bottlenose dolphin population, the application minimizes these effects without adequate supporting evidence.

There exists an inconsistency within the application, acknowledging the necessity for licences to permit harm to European Protected Species while simultaneously asserting that impacts are negligible. This contradiction casts doubt on the credibility of the assessment and raises compliance concerns with the Habitats Regulations, especially where potential harm is anticipated to a degree requiring legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts resulting from various pressures such as habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and 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 illustrate that the development can coexist with existing marine users or that it can avoid unacceptable impacts on marine biodiversity, thus obstructing any conclusion that the proposal constitutes sustainable development.

In summary, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies undermine the assessment's reliability. These shortcomings prevent a comprehensive evaluation of the impacts on marine life and fisheries.

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 fundamentally alters the night-time environment along the West Lewis coastline, which is characterised by exceptionally dark skies that contribute significantly to environmental quality, cultural identity, and tourism value.

Critically, the Environmental Impact Assessment lacks an evaluation of how this lighting may affect visual amenity, landscape character, and the experiences of both

residents and visitors. Such an omission is concerning, especially as dark skies play a vital role in the area's identity and in emerging sectors like astro-tourism. The absence of this assessment results in a noticeable gap in understanding the overall landscape and environmental impacts of the proposal.

Moreover, there is no consideration of the effects of artificial lighting on nocturnal wildlife. Species including the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to disorientation due to phototaxis, which can lead to increased collision risks. The application fails to include any lighting impact assessment or phototaxis study, thus neglecting to assess potential effects on these species or the possibility of increased mortality.

The inadequacy of relying solely on daytime survey data in the ornithological assessment further exacerbates this issue, as it does not account for nocturnal activity or the associated risks. For example, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk remains unexamined. 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 would face adverse effects. The evidential standard necessary to exclude potential adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, the omission of these assessments is in conflict with the National Planning Framework 4 regarding the protection of natural places and environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the character of the night-time environment is an integral aspect of the overall ecosystem.

In summary, the complete 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 renders the application incomplete and unable to support a lawful determination.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal does not meet the requirements for sustainable development as outlined by statutory duties, national policy, and evidential standards. It mirrors the main issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the degree of industrialisation was deemed unacceptable. This new application is presented under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The application lacks a complete and reliable evidential basis for determination. There are significant gaps in baseline data, an undefined design envelope, unspecified

mitigation measures, and key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects are missing. Consequently, the Environmental Impact Assessment is incomplete and does not provide a thorough understanding of the likely significant effects or residual impacts.

Procedural failures are evident as well. The absence of a compliant Island Communities Impact Assessment violates statutory requirements under the Islands (Scotland) Act 2018, and the failure to provide the full Social Impact Assessment is a serious omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

This proposal contradicts the National Planning Framework 4. It does not adequately protect biodiversity, natural places, or cultural heritage, fails to demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to missing tourism impact modelling. Additionally, the cumulative impact of both offshore and onshore elements has not been properly evaluated, leaving effects on peatlands, carbon balance, habitats, and crofting land unclear.

There are considerable uncertainties regarding environmental risks. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in parts. The evidential threshold necessary to confidently exclude adverse effects has not been achieved, which engages the precautionary principle and prevents a lawful conclusion about 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, the disruption of cultural and visual relationships, and negative impacts on tourism represent lasting effects that cannot be adequately mitigated.

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 278A8A31

Member of the public 2001

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

Dear Sir/Madam

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

The application lacks a robust evidential basis for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, several key components of the proposal remain undefined. The use of a flexible design framework hinders a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures renders any evaluation of their effectiveness impossible. Consequently, the documentation fails to offer a comprehensive understanding of the environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects lack adequate support from reliable evidence.

There are evident and serious conflicts with established policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural landscapes, cultural heritage, and health and wellbeing. It does not convincingly demonstrate that national mandates to safeguard biodiversity, climate interests, and environmental integrity will be fulfilled. These conflicts are critical to the statutory tests required for consent and undermine the competent authority's ability to determine that the development meets policy standards.

The scale of the proposed development is unprecedented for this area, with large turbines situated alarmingly close to the shoreline, which introduces substantial concerns about landscape capacity, visual dominance, and environmental repercussions. Collectively, the insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and unfit to support a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application demonstrates a fundamental inadequacy in its assessment of cultural heritage and community identity, failing to acknowledge the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are interconnected. It adopts a reductive view, treating heritage merely as a collection of isolated, static assets and neglecting their ongoing social, cultural, and spiritual significance within the community.

There is a significant oversight in the assessment of culturally important sites, particularly the cemeteries at Dalmore, Bragar, and Barvas. These sites function as active places for burial and spiritual practice, yet they are mischaracterised as static features. This misrepresentation fails to consider their continued use and meaning, as well as the development's impact on their surroundings. Such an inadequate portrayal leads to an incomplete evaluation of cultural effects and disregards their integral role in community life.

Moreover, the application neglects to address intangible cultural heritage, such as the Gaelic language and traditions, alongside the enduring relationship between the community and its coastal environment. These aspects are vital to the area's identity but have been entirely omitted from the assessment, indicating a serious lapse. Without incorporating these elements, the true cultural impact of the development remains obscured.

Concerns extend to community rights and engagement, particularly for the Gaelic-speaking population, which possesses a distinct cultural identity akin to that of an Indigenous People. However, the absence of a Free, Prior and Informed Consent process undermines the credibility of the assessment, neglecting essential principles of participation in decisions that affect cultural and environmental interests.

A critical procedural flaw lies in the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The omission of this assessment prevents the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic impacts on the island community, making a lawful determination impossible.

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing is fundamentally lacking, with insufficient transparency for a lawful evaluation. Although a Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, the complete report has not been made public. This represents a considerable evidential gap that hinders both public understanding and the competent authority's ability to assess the full scope of social risks highlighted by the developer's own research.

Summaries available indicate that residents are currently facing significant stress, anxiety, and concern due to the proposal's scale and proximity. These consequences arise from direct community engagement and are thus grounded in reality rather than speculation. However, the absence of the full assessment restricts proper examination of these findings and limits the determination of their significance in the decision-making process.

Furthermore, there is evidence suggesting that the proposal threatens community identity and cohesion, with "cultural loss" identified within the developer's own findings. Despite this, these social impacts have not been adequately included in the main application or given the necessary weight in considerations. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. It is critical to have a comprehensive understanding of social, economic, and health impacts for developments of this magnitude, especially when community character and functioning may be at risk. The failure to provide the full dataset means that the application does not present a complete evidential basis necessary for evaluating the balance between benefits and harms.

From a policy standpoint, the application does not show compliance with National Planning Framework 4 regarding health and wellbeing. Development must not only support positive health outcomes but also avoid causing harm; however, the available evidence points to existing adverse effects that remain undisclosed. Without access to the full assessment, compliance with this policy cannot be established.

The procedural implications are substantial, as the competent authority cannot conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment. This is a significant omission within the application and represents a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, combined with 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 for consideration.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm starkly fails to meet the criteria for sustainable development when measured against statutory duties and national policy. It echoes the critical issues that led to the denial of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was established. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland conservation, landscape integrity, and community wellbeing, the application presents serious deficiencies.

There are significant gaps in the evidential basis required for determining the proposal. The use of an undefined design envelope, reliance on unspecified mitigation measures, and crucial omissions in baseline data regarding nocturnal wildlife, full onshore infrastructure, and tourism impacts leave the Environmental Impact Assessment incomplete. This incompleteness hinders a comprehensive understanding of the likely significant effects or residual impacts that may arise from the project.

Procedural failures are also evident in this application. The lack of a compliant Island Communities Impact Assessment constitutes a breach of the statutory obligations outlined in the Islands (Scotland) Act 2018. Furthermore, the failure to provide the full Social Impact Assessment is a significant omission. These shortcomings impede the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

The proposal conflicts directly with National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural areas, and cultural heritage. Additionally, there is no assurance that health and wellbeing impacts are acceptable, and the absence of tourism impact modelling undermines claims of a net economic benefit. The failure to adequately assess the cumulative effects of both offshore and onshore elements obscures potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertain and potentially significant environmental risks persist due to incomplete assessments of marine ecology, seabirds, protected species, and marine mammals. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing any lawful determination that impacts would be acceptable.

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

In summary, the application is fundamentally flawed both procedurally and substantively. The overwhelming scale of information gaps, coupled with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision-making process. Therefore, it is essential that the competent authority either

refuse consent based on these grounds or invoke the appropriate regulatory measures to ensure that the missing information is submitted.

It is requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

Energy not being used to support local area, far larger than standard turbine, too close to families and housing.

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: D8A75455

