Member of the public 639

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 proposal is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline and strong cultural identity. A review of the Environmental Impact Assessment Report and accompanying documentation reveals significant deficiencies in planning, environmental, cultural, and procedural aspects.

The application lacks a sufficient evidential basis for a lawful determination. There are critical gaps in environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many key elements of the proposal remain undefined. The employment of a flexible design framework hinders a clear assessment of likely significant effects, and the proposed mitigation measures, which have not yet been specified, preclude an evaluation of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

There are significant policy conflicts inherent in the proposal. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts are critical to the statutory tests necessary for consent and compromise the ability of the competent authority to deem the development acceptable in policy terms.

The unprecedented scale of the proposal raises further concerns, with large turbines positioned in close proximity to the shoreline, leading to significant issues regarding landscape capacity, visual dominance, and environmental impact. In light of the lack of sufficient information, the reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance, it is evident that the application is incomplete and incapable of supporting a lawful determination. Under these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks crucial information and does not offer a full, transparent, or reliable account of the likely environmental effects associated with the proposal. The introduction of a flexible Project Design Envelope,

which does not commit to specific dimensions, layouts, or configurations of turbines, creates significant uncertainty. This variability undermines the integrity of the assessment and means that the impacts outlined may not correspond to the actual development that would be constructed. Consequently, both the public and the competent authority are left without a clear understanding of the true extent of environmental effects.

Additionally, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the promise that environmental harm will be addressed later prevents a meaningful evaluation of these measures' effectiveness or an accurate assessment of residual impacts. This deferral of essential information to post-consent phases is procedurally unacceptable and contradicts the intentions behind the Environmental Impact Assessment regime, which demands that significant effects and mitigation strategies be clearly established before determination.

There are also serious evidential gaps within the report, which include deficiencies in baseline data, limitations in methodology, and an over-reliance on assumptions instead of site-specific evidence. Such shortcomings lead to uncertainty surrounding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of adequate information hinders a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot comply with statutory obligations.

As a result, the application does not meet the evidential threshold stipulated under the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, including the requirements for biodiversity protection and environmental integrity, as it has not been shown that impacts have been fully evaluated or that appropriate safeguards are established.

In summary, the combination of an undefined design envelope, a lack of specified mitigation, and insufficient baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These significant deficiencies impede a lawful and thorough assessment of environmental effects and leave the competent authority unable to make an informed decision based on the information presented.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species demonstrates significant deficiencies, failing to deliver a complete understanding of the ecological receptors in the West Lewis coastal environment. This area is a biologically active marine system, yet the baseline data provided is incomplete. Moreover, the methodologies employed do not adequately capture the presence, behaviour, and habitat use of various species,

resulting in an assessment that lacks a solid evidential basis for evaluating potential impacts.

Notably, the application neglects to properly recognise and assess the active use of coastal areas by otters, a European Protected Species, for foraging and movement. The absence of consideration for their core foraging range and behavioural patterns leads to an inadequate assessment of the potential effects of construction disturbance, noise, and increased activity. Consequently, this undermines the conclusions drawn regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks is flawed due to a reliance on aerial surveys, which introduces substantial detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The failure to incorporate or properly consider such critical data results in an incomplete baseline and undermines the reliability of the conclusions presented.

These methodological shortcomings mean that conclusions regarding negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty casts doubt on the true scale of risk posed to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application contains significant deficiencies that compromise its reliability, stemming from internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. Notably, the application does not meet the required evidential standard to demonstrate that internationally important seabird populations, particularly those associated with protected sites such as the Lewis Peatlands and St Kilda, will not be adversely affected. The assessment overlooks the importance of these feeding grounds and relies on modelling approaches that introduce uncertainty, especially for declining species like Kittiwakes and Fulmars. Furthermore, there is a fundamental contradiction in the developer's conclusions, as they assert no significant

adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated.

The site for the development is situated within key foraging areas and migratory pathways, yet the assessment inadequately evaluates the implications of displacement, collision risk, and habitat loss. The placement of turbines within a recognised migratory corridor raises additional concerns, as it poses a significant risk by creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term consequences of potential sustained mortality in this corridor have not been adequately addressed, particularly for species with relatively small global populations.

From a regulatory standpoint, the application fails to satisfy the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and limitations in the modelling process indicates that the necessary standard of beyond reasonable scientific doubt has not been met. This engages the precautionary principle and obstructs a lawful conclusion that would support consent.

Moreover, the identified deficiencies represent non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that important seabird populations will not face adverse effects places the proposal in direct conflict with national policy. Collectively, these factors culminate in a conclusion that the assessment is unreliable and that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is severely deficient, neglecting to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts a narrow perspective, treating heritage as isolated and unchanging assets, rather than acknowledging their continuing social, cultural, and spiritual relevance within the community.

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

Moreover, the assessment lacks a consideration of intangible cultural heritage, which encompasses the Gaelic language, local traditions, and the longstanding relationship between the community and the coastal environment. These components are crucial to the area's identity but are entirely omitted from the evaluation, representing a

significant oversight. The absence of these factors hinders a proper understanding of the cultural impact of the proposed development.

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

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

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

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

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.

FISHERIES AND MARINE LIFE

The evaluation of the proposal's impact on fisheries and marine life lacks thoroughness and fails to provide a credible analysis of both ecological and socio-economic consequences. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a significant fishing industry, yet the application does not adequately ensure that these vital resources and habitats will remain protected from significant disruption.

A critical concern is the assumption that fishing activities can be relocated without negative repercussions. There is no evidence presented that alternative fishing grounds exist, are accessible, or can sustain additional demands. This lack of information is crucial, as such displacement may lead to overfishing in other areas, adversely

affecting the local fishing fleet's economic viability. Without a definitive and evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over extended periods is expected to cause disturbances over large areas, impacting species such as dolphins. The anticipated disruption to a notable proportion of the local bottlenose dolphin population raises significant concerns, yet the application inadequately addresses the severity of these effects, lacking sufficient evidence to support its claims.

The application presents an inconsistency by acknowledging the need for licences to permit harm to European Protected Species while simultaneously characterising these impacts as negligible. This contradiction casts doubt on the validity of the assessment and raises issues regarding adherence to the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves an integrated project that includes both offshore turbines and onshore infrastructure. However, the assessment of the onshore elements is incomplete, failing to consider the full extent of the impacts. This separation of the offshore and onshore components results in a fragmented approach that obscures the true scale of environmental and socio-economic effects.

The onshore works include cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities entail excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive

habitat. Without a comprehensive evaluation of these impacts, there is a lack of understanding regarding the project's overall environmental footprint.

By not fully assessing onshore impacts, the application fails to facilitate an accurate evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project components must be considered together, yet the current division between offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not thoroughly understood.

There are considerable risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not sufficiently demonstrate that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented. This creates a significant evidential gap concerning biodiversity protection.

Furthermore, the proposal raises concerns about carbon balance. Disturbance of the peatland can release stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy development. The application fails to adequately address this matter or to show that the overall carbon balance remains beneficial.

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

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

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal is fundamentally flawed in its failure to meet the requirements of sustainable development, as assessed against statutory obligations, national policy, and evidential standards. This application mirrors the core issues that resulted in the 2008 rejection of the Lewis Wind Power proposal, which was deemed unacceptable due to the scale of industrialisation. Now, despite being put forth under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it falls short of the necessary standards.

The evidential basis for determining this application is incomplete and unreliable. There are significant gaps in baseline data, the design envelope remains undefined, and the reliance on unspecified mitigation measures is problematic. Additionally, it overlooks essential impact pathways, including those concerning nocturnal wildlife, onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of the likely significant effects and residual impacts.

Procedural shortcomings are evident throughout the application. The lack of a compliant Island Communities Impact Assessment breaches statutory duties set forth in the Islands (Scotland) Act 2018. Furthermore, the omission of the full Social Impact Assessment constitutes a material failure. 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.

Moreover, the proposal conflicts directly with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural spaces, or cultural heritage, nor does it establish that health and wellbeing impacts are acceptable. There is also a lack of evidence for a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been properly evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially severe. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in various areas. The evidential requirements needed to exclude adverse effects beyond reasonable scientific doubt have not been satisfied, necessitating the application of the precautionary principle, which prevents a lawful determination that impacts are acceptable.

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

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

In light of these considerations, I formally request that the application for the Spiorad na Mara Offshore Wind Farm is entirely refused.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: DD3DC552

Member of the public 640

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 arises from a thorough review of the Environmental Impact Assessment Report and the associated documentation, revealing significant deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The proposal lacks a solid evidential foundation for a lawful determination. Essential environmental data is absent, with limited and inconsistent baseline information, and several critical aspects of the proposal remain undefined. The application employs a flexible design framework that hinders a clear understanding of the likely significant effects. Moreover, the reliance on unspecified mitigation measures prevents any assessment of their potential effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of the impacts on the environment, culture, and community, and assertions of negligible or non-significant effects lack robust evidential support.

The application demonstrates clear policy inconsistencies. It appears 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. There is insufficient evidence to prove that the national obligations regarding biodiversity, climate interests, and environmental integrity will be met. These inconsistencies challenge the statutory tests necessary for consent and compromise the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal raises substantial concerns, with large turbines sited close to the shoreline, resulting in significant implications for landscape capacity, visual dominance, and environmental impact. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance indicate that the application is incomplete and incapable of sustaining a lawful determination. Under these conditions, the precautionary principle must be invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is significantly inadequate, failing to offer a complete or reliable

understanding of the ecological receptors present. This area is characterised as a biologically active and highly sensitive marine system, yet the baseline data collected is insufficient, and the methodologies employed do not effectively capture species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A notable shortcoming is the treatment of otters, which are classified as a European Protected Species. The application does not adequately acknowledge or evaluate their active use of coastal zones for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to an incomplete assessment of the possible effects of construction disturbance, noise, and heightened activity, thereby undermining any conclusions that suggest no significant effects on this species.

In addition, the evaluation of basking sharks is flawed, as it relies on aerial surveys that introduce significant detection bias, especially under Atlantic weather conditions. This methodology is prone to underestimating the presence of basking sharks, particularly when compared to established land-based observations that indicate their frequent usage of these waters. The neglect to incorporate or appropriately consider such data results in an incomplete baseline, further diminishing the reliability of the conclusions drawn.

The methodological shortcomings lead to conclusions regarding negligible or non-significant effects that rest on assumptions rather than substantial evidence. The lack of adequate baseline data also obstructs meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation generates uncertainty concerning the true extent of risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not satisfy the Environmental Impact Assessment requirements or those of National Planning Framework 4, as there has been insufficient identification or evaluation of protected species. The uncertainty introduced by these deficiencies means that adverse effects cannot be excluded beyond reasonable scientific doubt, thus necessitating the precautionary principle. Under these conditions, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions renders the assessment unreliable. These issues inhibit a thorough evaluation of impacts on marine ecology and protected species, supporting the overall assertion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents an ornithological assessment that is fundamentally flawed, characterised by significant evidence gaps and internal contradictions that compromise its findings. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already in decline. However, the application fails to meet the necessary evidential standards to

demonstrate that these species will not experience adverse effects. The development is situated within crucial foraging areas and migratory routes, yet the assessment does not sufficiently examine the potential consequences of displacement, collision risk, or habitat loss.

Moreover, there exists a fundamental contradiction within the application, where the developer concludes that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is typically warranted only when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment, suggesting that the conclusions drawn lack support from the evidence provided. The assessment is inadequate in demonstrating that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will not be affected. The significance of these feeding grounds is not comprehensively addressed, and the reliance on modelling methodologies introduces uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the lack of understanding of behavioural responses.

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

From a regulatory standpoint, the application does not satisfy the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside gaps in data and limitations of the modelling, indicates that the standard of beyond reasonable scientific doubt has not been attained. This invokes the precautionary principle and hinders a lawful conclusion in support of the proposal.

Furthermore, the identified deficiencies constitute a failure to adhere to the National Planning Framework 4 in terms of biodiversity protection and the preservation of natural assets. The inability to establish that internationally important seabird populations will not be adversely impacted positions the proposal in direct opposition to national policy.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment, which included focus groups with local residents, yet the full report remains unpublished. This lack of

disclosure constitutes a significant evidential gap that hinders the public and the competent authority from grasping the complete scope of social risks identified in the developer's own research.

Summaries indicate that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are derived from direct engagement, thus are not speculative. However, the failure to make the full assessment available limits proper scrutiny of the findings and restricts the ability to assess their significance in the decision-making process.

There is additional evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" acknowledged within the developer's own findings. Despite this acknowledgment, such impacts have not been fully incorporated into the main application or afforded the appropriate weight. The withholding of the complete Social Impact Assessment therefore clouds the true human and social costs associated with the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially where community character and function may be compromised. The application, by not providing the full dataset, fails to present a comprehensive evidential basis necessary for evaluating the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments must promote positive health outcomes and avoid harm; however, existing evidence highlights adverse effects that have not been fully disclosed. Without access to the complete assessment, compliance with this policy cannot be substantiated.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment, representing a material omission within the application and a failure to fulfil 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, results in an incomplete and unreliable assessment. This deficiency prevents a lawful determination and underscores that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment concerning seascape, landscape, and visual impacts is significantly inadequate and does not properly address the extent of the anticipated change or the sensitivity of the affected environment. The coastline of West Lewis is characterised by an open Atlantic horizon, an undeveloped landscape, and a profound sense of

remoteness. The proposed introduction of large-scale turbines in close proximity to the shore would impose a continuous and overwhelming industrial presence, fundamentally transforming this character and leading to a permanent and irreversible change to the landscape.

Moreover, the application fails to accurately depict the magnitude of the anticipated visual change. Given their scale and proximity, the turbines would dominate the views from residential areas, historic locations, and frequently visited coastal sites. This would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately communicate this level of impact or its significance within the context of such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly regarding significant cultural heritage sites and high-value landscapes. This raises the possibility that the assessment may have understated the magnitude of visual impact, thereby compromising the overall reliability of the evaluation.

A significant oversight is the failure to consider the interconnectedness between landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are integral to a broader landscape, interconnected by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated entities, neglecting their interdependence and resulting in an incomplete evaluation of impacts on their context and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the preservation of natural places and historic assets. The extent of change proposed is inconsistent with the obligation to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of compliance with policy requirements.

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

Overall, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interrelated nature of landscape and heritage. These

shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is inconsistent with the safeguarding of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The current application presents serious deficiencies in its assessment of construction and pollution risks, failing to provide the necessary detail for a comprehensive evaluation of environmental effects. Significant seabed preparation and installation work is proposed in a high-energy Atlantic environment, yet it lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be formulated post-consent, thus hindering any meaningful assessment of their potential adequacy or effectiveness.

The reliance on unspecified future measures is particularly alarming in light of the delicate receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are sensitive to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to offer sufficient details on how these risks will be prevented, controlled, or monitored.

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

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

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is mandatory that likely significant effects and mitigation strategies are assessed prior to consent; without this information, a lawful determination cannot be made. The application also does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the current application presents an inadequate assessment of fisheries and marine life, failing to robustly evaluate ecological or socio-economic impacts. There is a significant concern regarding the assumption that fishing activities can be displaced without adverse effects. The application lacks evidence that alternative fishing grounds are available or can absorb additional pressure, raising the risk of overfishing in other areas, which could have far-reaching economic consequences for the local fishing fleet. Without a thorough and evidence-based assessment, the potential impacts on fisheries and local livelihoods remain poorly understood.

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure presents significant gaps and fails to fully recognise the interconnected nature of the project. The offshore turbines and onshore works should be considered as one integrated project; however, the separate evaluations obscure the true magnitude of environmental and socio-economic effects, resulting in a fragmented understanding.

Onshore activities encompass cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure that traverses sensitive landscapes. These undertakings involve excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, which hampers a comprehensive understanding of the project's overall environmental footprint.

By deferring the assessment of onshore impacts, the application limits the evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components be considered collectively; however, the division between offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities remain unclear.

There are also notable risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application fails to demonstrate that these habitats have been thoroughly assessed or that suitable avoidance measures have been adopted. This evidential gap poses a threat to biodiversity protection.

Additionally, there are concerns about carbon balance due to the disturbance of peatland, which releases stored carbon and may lead to a carbon debt, counteracting the aims of renewable energy development. The application does not sufficiently tackle this concern or show that the overall carbon balance is advantageous.

Furthermore, routing infrastructure through active croft land raises potential conflicts with current land use and legal rights. The application does not provide evidence that the requisite consents or processes have been initiated, casting doubt on the project's feasibility and legality.

From a policy standpoint, the failure to assess the project in its entirety and demonstrate the protection of peatlands, habitats, and land use interests stands in opposition to the National Marine Plan and National Planning Framework 4. The lack of proof that impacts can be avoided or mitigated further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife within the Environmental Impact Assessment represents a critical oversight. The West Lewis coastline is known for its exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism value. The proposed introduction of permanent red aviation lighting, visible across long distances, would create a continuous and intrusive effect on the western horizon, fundamentally altering the night-time landscape.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. Given the significance of dark skies to the region's identity and the burgeoning sector of astro-tourism, this omission is particularly concerning. The lack of consideration for these impacts highlights a substantial gap in the overall landscape and environmental assessment.

Equally alarming is the failure to assess impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to their phototactic behaviour, which may lead to disorientation and an increased risk of collision. The application does not include any evaluation of lighting impacts or a study on phototaxis, resulting in a lack of understanding regarding how aviation lighting could affect these species or contribute to increased mortality rates.

This oversight is exacerbated by the use of daytime survey data in the ornithological assessment, which neglects to capture nocturnal activities and associated risks. Other species, like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been adequately assessed. The absence of site-specific night-time data creates a significant void in understanding ecological impacts.

Without a thorough assessment of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites may face adverse impacts. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be met, thus engaging the precautionary principle and obstructing a lawful determination.

From a policy perspective, these omissions contradict National Planning Framework 4 regarding the protection of natural places and environmental quality. Moreover, they undermine the comprehensive evaluation of landscape and seascape impacts, as the character of the night-time environment is an essential component of the overall ecosystem.

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

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.

Additional Comments

The island of Lewis needs protecting from any large scale development which has little benefit, if any, advantages to the local people and the landscape. It will be changed forever and should not be happening.

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: 744AD364

Member of the public 641

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

Dear Sir/Madam

I am writing to formally object to the Spiord na Mara Offshore Wind Farm application (MD-00011742 & MD-00011743).

I live on the Isle of Lewis and have a direct, long-term interest in the environmental, cultural, and socio-economic integrity of this landscape. My objection is based on substantial concerns regarding procedural failures, ecological risk, and the irreversible impact on cultural heritage and community wellbeing.

First, there has been a clear failure of meaningful and early community engagement. The identification and leasing of the N4 area occurred without genuine consultation with west Lewis communities. This is contrary to Scotland's National Marine Plan (NMP), particularly GEN 18, and paragraph 4.77, as well as the National Planning Framework 4 (NPF4) Just Transition principle, which emphasise early, proportionate, and meaningful engagement with affected communities. In this case, engagement appears to have been retrospective rather than formative, undermining trust in the process and limiting the ability of local people to influence decisions affecting their environment.

Second, the Environmental Impact Assessment Report does not adequately address the cultural significance of the landscape. The west coast of Lewis is not simply a physical environment but a lived cultural landscape with deep connections to Gaelic language, heritage, and identity. The omission of any meaningful assessment of intangible cultural heritage and cumulative impacts on cultural continuity is inconsistent with NMP paragraph 4.20 and NPF4 Policy 7(a).

Third, the proposal presents serious and insufficiently assessed risks to protected bird populations and habitats. The development overlaps with key foraging areas associated with the Lewis Peatlands SPA and lies within wider ecological and migratory networks, including those linked to St Kilda. The assessment of collision risk, displacement, and barrier effects appears inadequate. It is not evident that the proposal can meet the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended), the Offshore Marine Conservation (Natural Habitats, &c.) Regulations, the Marine (Scotland) Act 2010, and the Wildlife and Countryside Act 1981, nor NPF4 Policies 11(e) and 7(i).

Fourth, the development would cause significant harm to the setting of nationally important heritage assets, including the Calanais monuments and other scheduled sites along the west coast. The introduction of a large-scale industrial horizon into an otherwise open seascape would fundamentally alter their experiential and visual context. This is not a minor or reversible effect and conflicts with NMP paragraphs 4.22

and 4.23 and NPF4 Policy 7(h).

Fifth, there is a concerning disconnect between offshore consent and onshore impacts. The proposal proceeds despite unresolved and unassessed impacts on sensitive onshore environments, particularly peatland systems. Given the importance of peatlands for biodiversity, carbon storage, and hydrological function, this fragmented approach is inconsistent with a precautionary or integrated planning approach and with NPF4 Policy 3. It also conflicts with NMP paragraph 4.77 and raises concerns regarding the adequate consideration of statutory rights under the Crofters (Scotland) Act 1993.

From a hydrological perspective, the Environmental Impact Assessment appears to underrepresent the functional connectivity between offshore infrastructure, landfall works, and adjacent peatland systems. Peatlands in Lewis are hydrologically sensitive, low-gradient systems where small alterations to drainage pathways, groundwater–surface water interactions, or compaction can lead to disproportionate and spatially extensive impacts. These include altered water tables, increased erosion, and long-term degradation of peat structure and carbon storage capacity. The EIAR does not clearly demonstrate that it has characterised baseline hydrological conditions at sufficient spatial or temporal resolution, nor that it has robustly assessed indirect and cumulative effects arising from construction, cable routing, and associated infrastructure. In particular, there is limited evidence of catchment-scale analysis or uncertainty quantification, which is essential in such systems. In the absence of this, conclusions regarding impact significance and mitigation effectiveness are not sufficiently substantiated. This level of uncertainty should trigger a precautionary approach, rather than deferral of assessment.

Sixth, the impact on the tourism economy and coastal character has been understated. The appeal of Lewis is intrinsically tied to its undeveloped coastline, dark skies, and sense of remoteness. Industrialising this seascape risks long-term damage to the qualities that sustain local tourism and associated livelihoods, contrary to NPF4 Policy 30 and NMP paragraph 12.28.

Finally, there is clear evidence of substantial local opposition to this development. Proceeding in the face of strong community resistance raises serious questions about alignment with the National Islands Plan.

Taken together, these issues indicate that the proposal is not adequately assessed, justified, or aligned with key planning and environmental protections. The scale and permanence of the potential impacts demand a far more robust and precautionary approach.

For these reasons, I respectfully request that this application be refused.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: AB3205F5

Member of the public 642

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 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 have been raised regarding the scale, proximity, and design of the proposal, which challenge its compatibility with statutory requirements, national policy, and the principles of sustainable development.

A thorough examination of the Environmental Impact Assessment Report and associated documentation reveals significant deficiencies that hinder a lawful determination. There is a notable absence of critical environmental data, limited and inconsistent baseline information, and key aspects of the proposal that remain undefined. The flexible design framework employed prevents a clear understanding of the likely significant effects, while the reliance on unspecified mitigation measures renders their effectiveness impossible to assess. Consequently, the information provided does not enable a comprehensive understanding of environmental, cultural, or community impacts, leaving claims of negligible or non-significant effects unsupported by robust evidence.

The proposal demonstrates clear and substantive conflicts with established policy frameworks. 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. It fails to show that national requirements for protecting biodiversity, climate interests, and environmental integrity can be satisfied. These conflicts directly undermine the statutory tests necessary for consent and impede the competent authority's ability to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal presents significant concerns regarding landscape capacity, visual dominance, and environmental impact, with large turbines positioned alarmingly close to the shoreline. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. Given these circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application lacks a reliable and transparent Environmental Impact Assessment Report, which fails to adequately detail the likely environmental effects of the proposal.

The introduction of a flexible Project Design Envelope, lacking firm commitments to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty compromises the integrity of the assessment process and results in impacts being presented that may not accurately represent the final development, thus hindering both public understanding and the competent authority's ability to comprehend the true environmental effects.

Moreover, the assessment places undue reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the assurance that environmental harm will be mitigated at a later stage undermines any meaningful evaluation of these measures' effectiveness or an assessment of residual impacts. This postponement of vital information to post-consent phases is procedurally unacceptable, contravening the Environmental Impact Assessment regime's intention, which stipulates that likely significant effects and associated mitigation must be clearly identified before a decision is made.

There are considerable evidential gaps, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such deficiencies create uncertainty about the magnitude and significance of impacts, especially where findings of negligible or non-significant effects are made without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

Consequently, the application does not satisfy the evidential standards mandated by the Habitats Regulations, which necessitate exclusion of adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not comply with National Planning Framework 4, which includes stipulations regarding biodiversity protection and environmental integrity, as it fails to demonstrate that impacts have been comprehensively assessed or that appropriate safeguards are established.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is inadequate and fails to deliver a complete or reliable understanding of the ecological receptors in the West Lewis coastal area. This environment is sensitive and biologically active, yet the baseline data is lacking, and the methodologies used do not effectively capture species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid

evidential basis for evaluating potential impacts.

One significant shortfall is the treatment of 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. This omission means that the core foraging range and behaviour of otters have not been considered, resulting in an inadequate evaluation of potential impacts from construction disturbance, noise, and increased activity. Therefore, the conclusions drawn regarding the absence of significant effects on this species are undermined.

There are also notable deficiencies in the evaluation of basking sharks. The reliance on aerial surveys creates a detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that show these waters are frequently used by basking sharks. The lack of incorporation or proper consideration of such data leads to an incomplete baseline, which further weakens the reliability of the conclusions drawn.

Due to these methodological issues, conclusions suggesting negligible or non-significant effects are based more on assumptions than on solid evidence. The absence of adequate baseline data also hinders the meaningful assessment of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the real risks 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, as it has not properly identified or assessed protected species. The uncertainty that is introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, it is not lawful to grant consent.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These shortcomings inhibit a thorough evaluation of impacts on marine ecology and protected species, contributing to the conclusion that the application does not rest on a sufficiently evidential foundation.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to disclose the full Social Impact Assessment is a critical issue that undermines the entire evaluation process. The competent authority is unable to conduct a thorough socio-economic and health assessment without access to this essential document, resulting in a significant material omission within the application. This lack of transparency not only contravenes the evidential requirements of the Environmental Impact Assessment regime but also hinders the ability to determine the true human and social costs associated with the proposed development.

Available summaries reveal that local residents are already grappling with measurable

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of the potential impacts on the seascape, landscape, and visual environment is significantly lacking and does not reflect the true scale of change nor the sensitivity of the area affected. The character of the West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would result in a continuous and overwhelming industrial presence, fundamentally changing this character and leading to a permanent and irreversible transformation of the landscape.

Moreover, the application fails to adequately depict the extent of the anticipated visual changes. Given the scale and proximity of the turbines, they would overshadow 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 does not sufficiently illustrate this impact or its significance within the context of such a sensitive landscape.

Concerns also arise from the methodology employed in the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not accurately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the

true magnitude of the visual impact has been underestimated, casting doubt on the reliability of the assessment.

A critical shortcoming is the lack of analysis regarding the interconnected relationship between the landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting connected visually and spatially to the Atlantic horizon. The assessment fails to acknowledge their interdependence, treating these heritage sites as isolated entities, which results in an incomplete assessment of the impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal directly contradicts the principles outlined in National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The extent of change posed by the project is incompatible with the necessity to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case scenario assessment further undermines any assertion of policy conformity.

It is evident that the impacts identified cannot be suitably mitigated. Due to the scale, height, and proximity of the turbines, their presence would be prominent and unavoidable. Thus, the resulting change is fundamental and permanent, incapable of being diminished to an acceptable level through any form of mitigation.

Collectively, the assessment inadequately represents the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings obstruct a reliable evaluation and reinforce the conclusion that the proposal is at odds with the protection of this landscape.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents significant concerns regarding the incomplete assessment of onshore infrastructure and its associated impacts, which are crucial for understanding the entirety of this integrated project. The offshore turbines and the onshore works are inherently connected, yet the current evaluation treats them as separate entities. This fragmented assessment obscures the true extent of environmental and socio-economic effects.

Onshore works encompass cabling that crosses protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, which is ecologically sensitive and serves as a significant carbon store. The lack of a comprehensive assessment of these impacts fails to provide a full

understanding of the project's overall environmental footprint.

The application's decision to exclude or defer the assessment of onshore impacts inhibits a thorough evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project components must be examined collectively. However, the disjointed consideration of offshore and onshore aspects means that the combined impacts on peatlands, habitats, and local communities remain inadequately understood.

Additionally, there are substantial risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not convincingly demonstrate that impacts on these habitats have been comprehensively evaluated, nor does it outline appropriate avoidance measures, leading to significant gaps in biodiversity protection.

Concerns are also raised regarding carbon balance due to the disturbance of peatland, which releases stored carbon and potentially incurs a carbon debt. This situation stands in opposition to the goals of renewable energy development. The application fails to address this matter adequately, nor does it show that the overall carbon balance is beneficial.

Furthermore, the routing of infrastructure through active croft land introduces possible conflicts with existing land use and legal rights. There is no evidence that the requisite consents or processes have been initiated, raising doubts about the project's deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project holistically, alongside the inability to demonstrate protection for peatlands, habitats, and land use interests, contradicts the National Marine Plan and National Planning Framework 4. The lack of evidence regarding the avoidance or mitigation of impacts further undermines the application.

In summary, the disconnection of project components, the absence of a thorough assessment, and insufficient evidence related to environmental and land use impacts render this section of the application incomplete and unreliable, ultimately hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This lighting will fundamentally alter the night-time environment of the West Lewis coastline, which is known for its exceptionally dark skies. The Environmental Impact Assessment fails to address the implications of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Such an omission is particularly concerning given the significance of dark skies to the area's identity and the burgeoning tourism sector focused on astro-tourism.

Moreover, there is no evaluation of the impact on nocturnal wildlife, which is critical. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, potentially facing disorientation and an increased risk of collision. The application does not include any lighting impact assessment or phototaxis study, failing to evaluate how aviation lighting might influence these species or lead to increased mortality rates.

The shortcomings are exacerbated by the dependence on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and the associated risks. Other species, like Kittiwakes, which may forage or migrate at night, are similarly at risk of disorientation from artificial lighting, yet this hazard has not been examined. The absence of site-specific night-time data leads to a critical gap in understanding the ecological impacts.

Without a thorough assessment of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites would be negatively affected. The evidential standard necessary to eliminate adverse effects beyond reasonable scientific doubt cannot be achieved, thereby invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, the lack of assessment contradicts the National Planning Framework 4, which seeks to protect natural places and uphold environmental quality. Additionally, it weakens the overall evaluation of landscape and seascape impacts, as the character of night-time is a vital component of the environment.

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

SUMMARY

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

There are notable deficiencies in baseline data, and the application relies on a vaguely defined design envelope. It also depends on unspecified mitigation measures and neglects critical impact pathways, including the effects on nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to offer a complete understanding of significant likely

effects or residual impacts.

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

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

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

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

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

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

Additional Comments

As a native of the islands, I find it disgraceful & disgusting that we are facing this situation - a situation where the government & international companies think we can be bullied, coerced and manipulated into accepting something which is not right for us, nor largely wanted in its current format.

The installation of such large turbines in close proximity to the westside of the islands where nothing like this has existed before is unacceptable. Ultimately, it is not a good deal for the islands, the environment or animals.

The total pollution, destruction of environment and industrialisation of Lewis due to wind turbines is not worth the pitiful recompense being offered.

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: C9D6EC6C

Member of the public 643

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 for consideration under the relevant marine licensing and Environmental Impact Assessment frameworks. It highlights significant deficiencies across planning, environmental, cultural, and procedural dimensions. Located off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns regarding the scale, proximity, and design of the proposal emerge due to its potential incompatibility with statutory requirements, national policy, and sustainable development principles.

A critical issue lies in the application's inadequate evidential basis for a lawful determination. There is a notable absence of essential environmental data, while the baseline information provided is both limited and inconsistent. Furthermore, key elements of the proposal remain undefined. The proposal's flexible design framework hinders a clear assessment of likely significant effects. Reliance on unspecified mitigation measures precludes an evaluation of their potential effectiveness. Consequently, the documentation fails to deliver a comprehensive understanding of environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence.

Moreover, there are evident and substantial conflicts with established policies. The proposal appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural spaces, cultural heritage, and public health and wellbeing. It does not convincingly demonstrate adherence to national obligations aimed at safeguarding biodiversity, climate considerations, and environmental integrity. These inconsistencies directly affect the statutory tests required for consent and hinder the competent authority's capacity to determine the proposal's policy acceptability.

The unprecedented scale of the proposal raises further alarm, with large turbines positioned uncomfortably close to the shoreline, which introduces serious concerns related to landscape capacity, visual impact, and environmental repercussions. Collectively, the insufficiency of information, dependence on undefined mitigation, evidential shortcomings, and clear policy discrepancies illustrate that the application is incomplete and incapable of facilitating a lawful determination. In light of these circumstances, it is imperative that the precautionary principle be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development presents significant concerns regarding marine ecology and the assessment of protected species, which is materially deficient. The West Lewis coastal environment is a highly sensitive and biologically active marine system. However, the existing baseline data is incomplete, and the methodologies employed do not adequately capture species presence, behaviour, and habitat use. This inadequacy leads to a lack of sound evidential basis for evaluating potential impacts.

Among the key issues is the failure to recognise and properly assess otters, a European Protected Species, and their active use of coastal areas for foraging and movement. The application does not take into account their core foraging range and behavioural patterns, which means the assessment does not adequately consider the potential effects of construction disturbance, noise, and increased activity. Consequently, this undermines any conclusions drawn regarding the absence of significant effects on this species.

Furthermore, the assessment of basking sharks exhibits similar deficiencies. The reliance on aerial surveys introduces significant detection bias, particularly under Atlantic conditions, which is likely to underestimate their presence. This is particularly concerning when compared to established land-based observations that suggest frequent use of these waters. The failure to incorporate or give proper consideration to such data contributes to an incomplete baseline, further weakening the reliability of the conclusions presented.

The methodological limitations in the assessment result in conclusions of negligible or non-significant effects being based on assumptions instead of robust evidence. Additionally, the absence of sufficient baseline data hinders meaningful evaluations of cumulative and indirect impacts, which include seasonal variation and broader ecosystem interactions. This introduces uncertainty about the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not meet the requirements outlined in the Environmental Impact Assessment regime and National Planning Framework 4. Protected species have not been properly identified or assessed, and the level of uncertainty generated prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

turbines in close proximity to the shoreline would create a dominating industrial presence, which would fundamentally alter this character and lead to a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts fails to adequately reflect the magnitude of this change or the sensitivity of the environment.

This application does not properly convey the significant visual impacts resulting from the scale and location of the turbines. Their presence would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and eroding the qualities of naturalness and remoteness. Furthermore, methodological concerns arise regarding the selection and presentation of visual viewpoints; there is evidence that these viewpoints do not fully represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. Such omissions introduce a risk of underestimating the magnitude of the visual impact, undermining the reliability of the assessment.

Moreover, there is a notable deficiency in assessing 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 that connects visually and spatially to the Atlantic horizon. The assessment treats these heritage assets as isolated rather than recognising their interdependence, which leads 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 experienced and severing their connection to the natural horizon. This represents a broader cultural and spatial harm that has not been sufficiently assessed.

From a policy standpoint, the proposal conflicts directly with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Additionally, the lack of a robust worst-case assessment further undermines claims of compliance with policy. It is evident that the identified impacts cannot be effectively mitigated; the scale, height, and proximity of the turbines would result in a presence that is dominant and unavoidable. The resulting change is therefore fundamental and permanent, rather than one that could be reduced to an acceptable level through mitigation.

Overall, the assessment fails to accurately represent the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies prevent a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of the construction and pollution risks associated with the proposal is insufficient and lacks the necessary detail to evaluate the potential environmental

impacts adequately. The project entails extensive seabed preparation and installation works in a high-energy Atlantic environment, yet it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be developed after consent, which impedes any meaningful assessment of their adequacy or effectiveness.

This reliance on unspecified future measures is particularly worrisome due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges the risks associated with sediment mobilisation and accidental chemical or oil spills, it does not provide adequate details on how these incidents will be prevented, controlled, or monitored.

There is considerable uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it 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 within the broader assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application limits the ability to evaluate whether proper safeguards are in place to manage pollution incidents. This introduces procedural risks and undermines the capacity of the competent authority to assess environmental protection measures adequately at the point of determination.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be assessed before granting consent, and the absence 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 combination of undefined mitigation measures, a lack of detailed management plans, and uncertainty about potential impacts results in a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents significant deficiencies in assessing the impacts on fisheries and marine life. It lacks a thorough evaluation of ecological and socio-economic consequences, particularly given the diverse marine ecosystem and the active fishing industry off the West Lewis coast. The application does not adequately demonstrate that these habitats and uses can be protected or maintained without substantial

disruption.

A critical concern is the flawed assumption that fishing activities can be displaced without any repercussions. The absence of evidence regarding the availability or accessibility of alternative fishing grounds capable of absorbing additional pressure is a crucial omission. This gap raises serious risks of overfishing in other areas, which could have broader economic implications for the local fishing fleet. The lack of a clear, evidence-based assessment means the potential impacts on fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, particularly due to underwater noise generated during construction. The anticipated high-energy hammer piling over a prolonged period is likely to cause disturbances over extensive distances, significantly affecting species such as dolphins. The potential disruption to a large proportion of the local bottlenose dolphin population is a major concern, yet the application diminishes the importance of these impacts without adequate supporting evidence.

There are evident inconsistencies within the application, where the requirement for licences to permit harm to European Protected Species is acknowledged, yet the impacts are simultaneously described as negligible. This contradiction undermines the assessment's credibility and raises serious questions regarding adherence to the Habitats Regulations, especially where harm is anticipated to an extent necessitating legal authorisation.

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

From a policy standpoint, the application does not align with the National Planning Framework 4 or the National Marine Plan. It does not sufficiently demonstrate that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity. This absence of compliance prevents any conclusion that the proposal represents sustainable development.

In summary, the overall lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment all contribute to a conclusion that is incomplete and unreliable. These shortcomings hinder a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application for the project is fundamentally flawed due to the incomplete assessment of onshore infrastructure, which neglects to acknowledge the full scope of impacts associated with what constitutes a single integrated project. The offshore

turbines and the onshore works are intrinsically connected, yet they have been evaluated separately. This disjointed approach obscures the true magnitude of environmental and socio-economic consequences.

Key onshore components include the installation of cabling across protected moorland, the construction of a substation close to Stornoway, and the development of access infrastructure through sensitive landscapes. The planned excavation across areas of deep peat, particularly in Barvas Moor, poses risks to a significant carbon store and an ecologically sensitive habitat. As it stands, the application fails to offer a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By deferring or excluding the assessment of onshore impacts, the application obstructs an accurate evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all facets of a project are considered collectively. The current separation of offshore and onshore elements means that the combined effects on peatlands, habitats, and local communities remain inadequately understood.

Furthermore, the project raises serious concerns about sensitive habitats, including machair systems and peatland environments, which are protected under policy. The application does not convincingly demonstrate that impacts on these vital habitats have been thoroughly evaluated or that effective avoidance measures have been implemented. This results in a significant evidential gap concerning biodiversity protection.

Additionally, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is no evidence provided that the requisite consents or processes have been initiated, which raises significant concerns about the project's deliverability and lawful implementation.

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

In summary, the fragmented evaluation 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 both incomplete and unreliable, impeding a lawful determination.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements for sustainable development when evaluated against statutory duties and national policy. This application echoes the key 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 policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application lacks a comprehensive evidential basis for evaluation.

Critical gaps in baseline data are apparent, alongside the use of an undefined design envelope. The reliance on unspecified mitigation measures and the omission of vital impact pathways, such as nocturnal wildlife, full onshore infrastructure, and tourism effects, render the Environmental Impact Assessment incomplete. This deficiency hinders a full understanding of potential significant effects and residual impacts.

Procedurally, the proposal suffers from clear failures. The lack of a compliant Island Communities Impact Assessment breaches the statutory duty outlined in the Islands (Scotland) Act 2018, while the failure to provide the complete Social Impact Assessment represents a significant omission. Such shortcomings obstruct the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In direct conflict with National Planning Framework 4, the proposal does not protect biodiversity, natural places, or cultural heritage. It fails to demonstrate acceptable health and wellbeing impacts and cannot evidence a net economic benefit due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been adequately assessed, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks posed by the proposal remain uncertain and potentially significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals, as well as inconsistencies within those assessments, mean that the evidential standard required to rule out adverse effects has not been achieved. This situation activates the precautionary principle, precluding a lawful conclusion about the acceptability of impacts.

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

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

Additional Comments

There are many other ways the the ocean can benefit the local economy. Think before you leap and head on a course you cannot turn back upon. Just been to the East Coast of UK today with a multitude of wind farms, 1/2 of which don't work.

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: C4567A01

Member of the public 644

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. The objection is grounded in a review of the Environmental Impact Assessment Report and associated documents. It highlights significant deficiencies in planning, environmental assessments, cultural considerations, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic coastline, near-pristine environment, and rich cultural heritage. Concerns arise from the scale, proximity, and design of the project in relation to statutory obligations, national policy, and sustainable development principles.

The application lacks sufficient evidential support for a lawful decision. Important environmental data is absent, baseline information is inadequate and inconsistent, and key details of the proposal remain unspecified. The flexible design framework employed complicates understanding of potential significant impacts, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the available documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining claims of negligible or insignificant effects that lack robust backing.

There are evident and serious policy inconsistencies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate-related interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and impair the competent authority's ability to determine the development's acceptability within policy frameworks.

This development's scale is unprecedented for the area, with large turbines proposed near the shoreline, raising significant issues about landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on vague mitigation measures, evidential shortcomings, and clear policy violations indicates that the application is incomplete and unfit for lawful consideration. Given these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is incomplete and lacks a clear account of the potential environmental effects of the proposal. The use of a flexible Project

Design Envelope, which does not commit to specific turbine dimensions or configurations, creates uncertainty and hinders a consistent worst-case scenario analysis. This compromises the assessment's integrity and means that the impacts reported may not accurately represent the actual development, leaving both the public and the relevant authorities unable to understand the true environmental implications.

The application depends on mitigation measures, management plans, and monitoring strategies that have yet to be defined. Therefore, consent is being sought with the understanding that any environmental harm will be addressed later, making it impossible to properly evaluate the effectiveness of these measures or assess residual impacts. This postponement of critical information to post-consent stages is not acceptable and contradicts the aims of the Environmental Impact Assessment framework, which demands that likely significant effects and mitigation strategies be clearly outlined before any decision is made.

There are also critical gaps in evidence, including a lack of baseline data and methodological limitations, which rely on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially where conclusions indicate negligible effects without solid supporting data. The insufficient information hampers a clear understanding of cumulative and worst-case impacts, creating scientific uncertainty that does not align with statutory obligations.

As a result, the application does not meet the evidential standard required under the Habitats Regulations to prove the absence of adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly regarding protected species and sensitive habitats. Furthermore, the proposal fails to show compliance with National Planning Framework 4, particularly the requirements for biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been thoroughly assessed or that adequate safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data make the Environmental Impact Assessment Report unreliable and inadequate. These shortcomings prevent a lawful and thorough assessment of environmental effects and leave the competent authority unable to make an informed decision based on the provided information.

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 assessment of the proposed development is fundamentally flawed, revealing significant gaps in evidence and internal contradictions that undermine its findings. Key foraging areas and migratory pathways critical to internationally important seabird populations on the west coast of the Isle of Lewis are inadequately addressed. Despite the serious decline of many of these species, the application fails to meet the necessary evidential standards to prove that they will not suffer adverse effects.

Within the application, there exists a troubling contradiction. The developer asserts that there will be no significant adverse effects, while also pursuing a Habitats Regulations derogation, a process that is only required when significant harm is anticipated. This

contradiction raises doubts about the assessment's credibility and indicates that the conclusions drawn lack sufficient support from the evidence provided.

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 acknowledges the importance of these feeding grounds, and the reliance on modelling introduces uncertainty, particularly for species like Kittiwakes and Fulmars, which are already in severe decline. The methodologies used are likely to underestimate mortality rates, especially given the incomplete baseline data and the lack of comprehensive understanding regarding behavioural responses.

The proposed siting of turbines within a recognised migratory corridor introduces a substantial risk by creating a barrier in a primary flight path utilized by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of continuous mortality within this corridor or the possible impacts on species that have relatively small global populations.

Regulatory concerns arise as the application does not fulfil the evidential threshold needed to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and methodological limitations, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, which prevents a lawful conclusion supporting consent.

Additionally, the deficiencies noted signify a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will remain unaffected places the proposal in direct opposition to national policy.

In conclusion, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and inadequate evidence. These shortcomings hinder a thorough evaluation of impacts and collectively lead to the determination that the application does not meet the statutory requirements necessary for approval.

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 failure to publish the full Social Impact Assessment presents a significant evidential gap, hindering both public understanding and the competent authority's ability to evaluate the social risks identified through the developer’s own research. This lack of transparency is particularly concerning given that the assessment was commissioned by the developer and included focus groups with local residents. Available summaries reveal that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts, derived from direct engagement, are substantive and should not be dismissed as speculative. The omission of the full assessment limits scrutiny of the findings and their significance in the decision-making process.

Moreover, there is substantial evidence indicating that the proposal threatens

community identity and cohesion, with “cultural loss” noted in the developer’s findings. However, these crucial impacts have not been adequately integrated into the main application or given the necessary consideration. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

The absence of transparency compromises the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health implications is vital for developments of this magnitude, especially when community character and functioning may be at stake. The failure to provide the complete dataset prevents the application from offering a comprehensive evidential basis to assess the balance between benefits and harm.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. While development should foster positive health outcomes and mitigate harm, the existing evidence points to adverse effects that remain undisclosed. Thus, without the full assessment, compliance with the requisite policy cannot be established.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This constitutes a material omission within the application and represents a failure to meet the evidential standards of the Environmental Impact Assessment regime.

In conclusion, the combination of the non-disclosure of the full Social Impact Assessment and the evidence of existing adverse impacts renders the assessment incomplete and unreliable, preventing a lawful determination and affirming that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

Concerns are also evident regarding the methodology used in selecting and presenting visual viewpoints. There is evidence suggesting that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the risk of underestimating the magnitude of visual impact, thus compromising the assessment's reliability.

Another critical deficiency is the failure to consider the interconnectedness of landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as isolated assets instead of recognising their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and affecting their relationship with the natural horizon. This represents not only a visual impact but also a more significant cultural and spatial harm that has not been properly assessed within the application.

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

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

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

CONSTRUCTION AND POLLUTION RISKS

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

This dependence on unspecified future measures raises serious concerns, particularly given the sensitivity of the West Lewis coastline, which is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it does not offer adequate detail on how these issues will be prevented, controlled, or monitored.

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

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

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

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the application fails to provide a robust evaluation of ecological or socio-economic impacts. The assessment of fisheries and marine life is insufficient, as it does not demonstrate that these vital uses and habitats can be protected or maintained without significant disruption.

A critical issue arises from the assumption that fishing activity can be displaced without consequence. The application lacks evidence that alternative fishing grounds exist, are accessible, or can support additional pressure. This significant omission risks overfishing in other areas, potentially leading to wider economic consequences for the local fleet. Without a clear, evidence-based assessment, the effects on fisheries and

livelihoods cannot be fully understood.

The proposal poses substantial risks to marine species, particularly due to underwater noise generated during construction. High-energy hammer piling over an extended period is likely to cause disturbance across considerable distances, affecting species such as dolphins. There are serious concerns regarding predicted disturbance to a significant proportion of the local bottlenose dolphin population, yet the application downplays the significance of these effects, lacking sufficient supporting evidence.

There is also an inconsistency within the application, where the need for licences to permit harm to European Protected Species is acknowledged, while impacts are simultaneously deemed negligible. This contradiction undermines the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Furthermore, the assessment does not adequately consider cumulative impacts arising from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a comprehensive evaluation of these combined effects, it is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal is fundamentally flawed due to its incomplete assessment of onshore infrastructure, which fails to recognise the interconnected nature of the offshore turbines and onshore works. This fragmented evaluation obscures the full extent of the environmental and socio-economic impacts associated with this single integrated project.

Critical onshore elements include the installation of cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure that traverses sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, an important carbon store and ecologically sensitive habitat. The lack of a thorough assessment of these impacts hinders a comprehensive understanding of the overall environmental footprint of the project.

By omitting or postponing the evaluation of onshore impacts, the application fails to facilitate an adequate assessment of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered together; however, the disaggregation of offshore and onshore elements results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

Furthermore, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are afforded policy protection. The application does not convincingly demonstrate that these habitats have been fully evaluated or that appropriate avoidance measures are in place, indicating a significant evidential gap regarding biodiversity protection.

Concerns also arise regarding carbon balance, as the disturbance of peatland may release stored carbon, leading to a potential carbon debt that contradicts the goals of renewable energy development. This issue is not adequately addressed in the application, which fails to prove that the overall carbon balance remains advantageous.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not supply evidence that the necessary consents or processes have been initiated, prompting doubts about deliverability and legal compliance.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed development introduces permanent red aviation lighting, which would be visible over long distances and create a continuous and intrusive “wall of light” effect across the western horizon. This alteration fundamentally changes the night-time environment, yet the application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the significance of dark skies to the identity of the area and the potential for emerging tourism sectors, such as astro-tourism, this omission in the Environmental Impact Assessment is particularly concerning.

Moreover, the absence of an evaluation of impacts on nocturnal wildlife is critical. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel

are known to be highly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collisions. The application lacks any form of lighting impact assessment or phototaxis study, resulting in a failure to evaluate how aviation lighting could adversely affect these species and potentially increase their mortality rates.

This lack of assessment is exacerbated by the reliance on daytime survey data in the ornithological evaluation, which overlooks nocturnal activity and associated risks. For instance, Kittiwakes may forage or migrate at night and are also susceptible to disorientation from artificial lighting; however, this risk has not been addressed. The failure to provide site-specific night-time data creates a significant gap in understanding the ecological impacts of the proposed development.

Without a proper assessment of nocturnal impacts, it remains 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 is not met, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, the omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. It further undermines the broader evaluation of landscape and seascape impacts, given that the character of night-time environments is a vital aspect of the overall ecosystem.

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

TOURISM

The application exhibits considerable deficiencies in its assessment of tourism impacts, crucially neglecting to analyse the economic and social ramifications for a vital sector of the Isle of Lewis's economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application indicates that 86% of visitors are attracted by scenery, it fails to provide a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution.

Tourism on the island has seen 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 does not model the potential impacts of the industrialisation of the seascape and the resultant loss of environmental quality on Tourism Gross Value Added or the broader economic resilience. This lack of analysis obscures the ability to ascertain whether the proposed development would generate a net economic benefit or threaten an established and burgeoning sector.

Moreover, the assessment neglects the critical role of environmental quality in underpinning tourism, particularly the significance of unspoiled landscapes and dark skies to the visitor experience and to emerging markets such as nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment exacerbates this shortcoming, leaving a considerable gap in understanding the potential impacts on an acknowledged and expanding segment of the local economy.

Given that the community on the island has limited economic diversification, the failure to assess tourism impacts raises broader concerns regarding employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been scrutinised as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly regarding economic impacts and the necessity to illustrate net benefit. It also conflicts with strategic objectives that prioritise tourism as a growth sector, and it lacks adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

In summary, the inadequacies in quantifying tourism impacts, assessing the environmental factors that drive visitor behaviour, and considering the island's economic reliance culminate in a substantial evidential gap. This hinders a thorough evaluation of economic effects and contributes to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements for sustainable development, as it does not align with statutory obligations, national policy, or evidential standards. This proposal mirrors the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Despite being introduced under an enhanced policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it lacks a solid evidential foundation necessary for determination.

There are significant gaps in the baseline data, which are compounded by the use of an undefined design envelope and a reliance on unspecified mitigation measures. Key impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, have been overlooked. Consequently, the Environmental Impact Assessment is incomplete and fails to provide a comprehensive understanding of potential significant effects or residual impacts.

Moreover, there are notable procedural shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to present a full Social Impact Assessment is a material omission, hindering the competent authority’s ability to

evaluate impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings render the application unfit for determination.

The proposal contradicts National Planning Framework 4, as it does not demonstrate sufficient protection for biodiversity, natural environments, and cultural heritage. It also falls short in evidencing acceptable health and wellbeing impacts and lacks tourism impact modelling, which is essential for establishing a net economic benefit. The cumulative effects of both offshore and onshore elements have not been adequately evaluated, resulting in obscured impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially severe. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidence required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and obstructs a lawful conclusion regarding the acceptability of impacts.

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

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

It is requested that the application for the Spiorad na Mara Offshore Wind Farm is rejected in its entirety.

Additional Comments

I come from the Hebrides and have parents still there, I do not want them subjected to the noise etc of the wind turbines. I also want to see those islands and coastlines the way God intended, not polluted and spoilt because of greed. We in Scotland do not need any more turbines neither does our marine and wildlife.

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: 737B99E0

Member of the public 645

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

Dear Sir/Madam

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally inadequate, failing to deliver a comprehensive or reliable understanding of ecological receptors within the West Lewis coastal environment. This marine system is both highly sensitive and biologically active, yet the baseline data is lacking, and the methodologies employed do not sufficiently capture the presence, behaviour, and habitat use of various species. Consequently, the assessment does not offer a solid evidential basis for evaluating potential impacts.

A notable shortcoming is the omission of otters, which are a European Protected Species. The application does not adequately recognise or 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 disturbance, noise, and increased activity remain insufficiently assessed. As a result, any conclusions drawn regarding the absence of significant effects on this species are compromised.

Further methodological deficiencies emerge in the assessment of basking sharks. The reliance on aerial surveys introduces a significant detection bias, particularly in the challenging conditions of the Atlantic. This method is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate frequent usage of these waters. The failure to incorporate or properly consider such critical data leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings imply that any conclusions suggesting negligible or non-significant effects are largely based on assumptions rather than robust evidence. Moreover, the absence of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This results in uncertainty regarding the actual level of risk 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 fails to properly identify or assess protected species. The uncertainty introduced undermines the ability to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

In summary, the presence of incomplete baseline data, flawed methodologies, and unsupported conclusions ultimately renders the assessment unreliable. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species and collectively support the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, exhibiting significant evidence gaps and internal contradictions that cast doubt on its conclusions. It is situated in an area of the west coast of the Isle of Lewis that is critical for internationally important seabird populations, many of which are already experiencing declines. The application does not adequately demonstrate that these species will not be adversely affected, despite their presence in key foraging areas and migratory routes. There is a lack of robust evaluation regarding displacement, collision risk, or habitat loss associated with the development.

Notably, a contradiction arises within the application itself, where the developer asserts that there will be no significant adverse effects while simultaneously advocating for a Habitats Regulations derogation case, which only applies when significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment, suggesting that the conclusions drawn are unsupported by the available evidence. Furthermore, the assessment fails to substantiate that seabird populations linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The crucial nature of these feeding grounds is not sufficiently acknowledged, and the reliance on modelling creates uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies employed are likely to underestimate potential mortality, especially in light of incomplete baseline data and insufficient understanding of behavioural responses.

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

From a regulatory standpoint, the application does not fulfil the evidential requirements necessary to ascertain no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and modelling limitations indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and hinders a lawful conclusion that would support the granting of consent. Additionally, these deficiencies demonstrate non-compliance with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The failure to show that internationally important seabird populations will not face adverse effects places the proposal at odds with national policy.

In conclusion, the assessment's reliability is undermined by internal inconsistencies, methodological inadequacies, and a lack of sufficient evidence. These shortcomings hinder a thorough evaluation of impacts and contribute to the overall determination that the application does not satisfy the statutory requirements needed for a lawful decision.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The 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 is a significant oversight that undermines the assessment of social impacts, health, and wellbeing associated with the proposed development. Although the developer engaged local residents through focus groups, the lack of transparency surrounding the complete report creates a substantial evidential gap. This deficiency not only inhibits the public's understanding of the risks identified but also restricts the competent authority's ability to perform a thorough evaluation of the proposal.

Summaries that are available indicate that local residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the development. These impacts are grounded in direct engagement with the community and are not speculative in nature. However, without access to the full assessment, the findings cannot be adequately scrutinised, thereby limiting the determination of their significance in the decision-making process.

Moreover, evidence suggests that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Yet these critical impacts have not been sufficiently incorporated into the main application or given the necessary weight. The decision to withhold the complete Social Impact Assessment obscures the true human and social cost associated with the development.

The lack of transparency has a detrimental effect on the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly when community character and functioning may be at stake. The omission of the full dataset means that the application lacks a complete evidential basis for assessing the balance between the proposed benefits and potential harm.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm, yet the evidence presented suggests existing adverse effects that remain undisclosed. In the absence of the complete assessment, compliance with these policy objectives cannot be affirmed.

The implications of this procedural inadequacy are significant. The competent authority is unable to conduct a robust socio-economic and health evaluation without the full Social Impact Assessment, representing a material omission within the application. This situation constitutes a failure to meet the evidential requirements mandated by the Environmental Impact Assessment framework.

In summary, the combination of non-disclosure of the full Social Impact Assessment alongside the evidence of existing adverse impacts leads to an incomplete and unreliable assessment. This situation ultimately obstructs a lawful determination and confirms that the application is not underpinned by sufficient information.

FISHERIES AND MARINE LIFE

The application lacks a comprehensive assessment of fisheries and marine life, failing to provide a thorough evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry, yet there is no evidence in the application demonstrating that these habitats and activities can be protected or maintained without significant disruption.

A major concern lies in the assumption that fishing activities can be displaced without repercussions. The application does not offer proof that alternative fishing grounds exist, are accessible, or can handle additional pressure. This significant omission raises the risk of overfishing in other areas and poses potential economic challenges for the local fleet. The inability to deliver a clear and evidence-based assessment means that the effects on fisheries and livelihoods remain unclear.

Moreover, substantial risks to marine species are introduced, particularly due to the underwater noise associated with construction activities. The use of high-energy hammer piling over an extended timeframe is expected to cause disturbances across considerable distances, impacting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population is alarming; however, the application downplays these effects without adequate supporting evidence.

There is a notable inconsistency in the application that acknowledges the need for licences to permit harm to European Protected Species while simultaneously describing impacts as negligible. This contradiction undermines the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

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

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

The proposal also raises issues related to carbon balance. Disturbing peatland releases stored carbon, which could lead to a carbon debt, contradicting renewable energy goals. The application does not sufficiently address this concern or show that the overall carbon balance is beneficial.

Furthermore, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application fails to provide evidence that necessary consents or processes have been started, which raises doubts about its deliverability and lawful execution.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in defining the area's environmental quality, cultural identity, and tourism

potential. However, the Environmental Impact Assessment fails to address the significant implications of the proposed permanent red aviation lighting, which would create a persistent and intrusive "wall of light" effect across the western horizon, drastically altering the night-time environment.

Moreover, the application does not evaluate how this lighting would impact visual amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly concerning given the growing significance of dark skies for the region's identity and the emerging sector of astro-tourism. The lack of consideration for these effects reveals a substantial gap in the overall assessment of the landscape and environment.

A more critical issue arises with the absence of an evaluation concerning the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are acutely sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application does not incorporate a lighting impact assessment or any study of phototaxis, neglecting to examine how aviation lighting may affect these species or contribute to higher mortality rates.

Furthermore, reliance on daytime survey data in the ornithological assessment fails to account for nocturnal activity and related risks. For instance, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting; however, this risk remains unassessed. The lack of site-specific night-time data leaves a significant gap in the understanding of ecological impacts.

Without an assessment of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites would face adverse consequences. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt cannot be achieved, thereby invoking the precautionary principle and obstructing a lawful decision.

From a policy standpoint, this omission contravenes National Planning Framework 4 regarding the safeguarding 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 essential component of the overall ecosystem.

In summary, the lack of any assessment concerning dark skies and nocturnal wildlife constitutes a significant evidential deficiency. The failure to provide baseline data, impact modelling, and species-specific analysis renders the application incomplete and inadequate for supporting a lawful determination.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm must be evaluated in light of its failure to meet the standards of sustainable development as dictated by statutory duties, national policy, and evidential requirements. It reflects the same core issues

that resulted in the rejection of the Lewis Wind Power proposal in 2008, particularly concerning the unacceptable scale of industrialisation. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

Critical gaps in baseline data are present, undermining the reliability of the evidential basis for determination. The proposal employs an undefined design envelope, relies on unspecified mitigation measures, and omits essential impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment lacks completeness, inhibiting a comprehensive understanding of significant effects and residual impacts.

The procedural shortcomings are also significant. The absence of a compliant Island Communities Impact Assessment constitutes a breach of the Islands (Scotland) Act 2018. Moreover, the failure to provide a full Social Impact Assessment represents a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These issues render the application unfit for determination.

Furthermore, the proposal conflicts with National Planning Framework 4, lacking adequate demonstration of biodiversity protection, natural area preservation, and cultural heritage safeguarding. It does not prove that health and wellbeing impacts are acceptable, nor does it present evidence of a net economic benefit, particularly due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements has been inadequately addressed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounds environmental risks, which could be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in parts. The necessary evidential threshold to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful determination that the impacts are acceptable.

Additionally, the proposal would inflict substantial and irreversible alterations to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption to cultural and visual relationships, and negative impacts on tourism will result in permanent changes that cannot be sufficiently mitigated.

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

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

Additional Comments

The scale of this proposed wind farm and the damage and disruption to our island far outweighs any suggested environmental benefits. We are being turned into a massive industrial estate with little benefit compared to the scale of what we will lose. As usual, the profits will go elsewhere and the losses are all ours.

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: CF87B35B

Member of the public 646

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 fundamentally flawed and fails to deliver a comprehensive, transparent, or trustworthy account of the potential environmental effects associated with the proposal. The incorporation of a flexible Project Design Envelope, which does not commit to particular turbine dimensions, layouts, or configurations, creates substantial uncertainty and hinders the consistent application of a worst-case scenario analysis. This diminishes the reliability of the assessment, making it difficult for both the public and the competent authority to grasp the true environmental impacts that may arise from the development.

The application also places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Therefore, the request for consent is predicated on the assumption that environmental harm will be addressed at a later stage. This approach obstructs any meaningful evaluation of the potential effectiveness of such measures or the assessment of residual impacts. Deferring key information to post-consent stages is not procedurally acceptable and contradicts the fundamental aim of the Environmental Impact Assessment process, which mandates that likely significant effects and mitigation strategies must be clearly established before a determination can be made.

Further evidential deficiencies are apparent, including significant gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. Such deficiencies create uncertainty surrounding the magnitude and significance of impacts, particularly in instances where conclusions of negligible or non-significant effects are asserted without robust supporting data. The lack of adequate information compromises the ability to understand cumulative and worst-case impacts and introduces scientific uncertainties that are not aligned with statutory obligations.

Consequently, the application fails to satisfy the evidential threshold stipulated under the Habitats Regulations, which is necessary to dismiss adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not illustrate adherence to National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it is unable to demonstrate that impacts have been fully evaluated or that appropriate safeguards are established.

In summary, the reliance on an ill-defined design envelope, the absence of specified mitigation measures, and the gaps in baseline data collectively render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings impede a lawful and thorough assessment of environmental effects and indicate that the competent authority cannot justifiably determine the application based on the information presented.

MARINE ECOLOGY AND PROTECTED SPECIES

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

One significant oversight is the treatment of otters, which are a European Protected Species. The application does not adequately recognise or assess their active usage of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns means the potential effects of construction disturbance, noise, and increased activity have not been thoroughly assessed. This lack of assessment undermines any conclusions regarding the absence of significant effects on this species.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents several significant constraints and sensitivities that undermine the validity of the ornithological assessment. It contains material flaws, evidenced by notable gaps and internal inconsistencies, which raise serious doubts about its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations that are currently experiencing decline. However, the assessment does not convincingly demonstrate, to the required evidential standard, that these species will remain unaffected by the proposed development. This proposal is situated within key foraging areas and migratory pathways, yet the assessment fails to adequately address the implications related to displacement, collision risk, or habitat loss.

Additionally, the application exhibits a fundamental contradiction. The developer asserts that there will be no significant adverse effects while also advancing a Habitats Regulations derogation case, which is necessary only when significant harm is anticipated. This inconsistency casts further doubt on the reliability of the assessment, indicating that its conclusions are not backed by the necessary evidence. The assessment falls short in providing adequate proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will not be adversely affected. The importance of these feeding grounds is insufficiently recognised, and the reliance on modelling methods introduces uncertainty, particularly for species experiencing severe declines, such as Kittiwakes and Fulmars. The methodologies utilised are likely to underestimate mortality rates, especially given that baseline data is lacking and behavioural responses are not fully understood.

The positioning of turbines within a recognised migratory corridor poses additional significant risks, as it effectively creates a barrier along a primary flight path used by species travelling between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of continued mortality in this corridor or the potential impacts on species with relatively small global populations.

Regulatory compliance is another concern; the application fails to meet the evidential threshold necessary to affirm that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, paired with data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and renders the conclusion supporting consent unlawful.

The identified deficiencies also signify a breach of 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 face adverse effects places the proposal in direct opposition to national policy.

In summary, the assessment's internal inconsistencies, methodological flaws, and lack of sufficient evidence render it unreliable. These shortcomings hinder a thorough evaluation of impacts and lead to the overarching conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a living cultural landscape where environment, language, tradition, and community are intrinsically connected. However, the assessment of cultural heritage and community identity is fundamentally inadequate, failing to recognise this complexity. It adopts a reductive approach, treating heritage as isolated, static assets without acknowledging their ongoing social, cultural, and spiritual functions within the community.

A significant shortcoming lies in the treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are mistakenly categorised as static features. This mischaracterisation fails to take into account their continued use and meaning, neglecting the impacts of development on their setting. As a result, the evaluation of cultural effects remains incomplete, overlooking their vital role in community life.

Moreover, the assessment fails to address intangible cultural heritage, such as the Gaelic language and traditions, which are essential to the area's identity. This omission significantly diminishes the understanding of the cultural impact of the development. The Gaelic-speaking population, recognised as an Indigenous People, possesses distinct cultural characteristics, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment, disregarding established principles of participation in decisions affecting cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018, represents a critical procedural failure. Without this assessment, the competent authority is unable to fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these deficiencies place the proposal in direct conflict with National Planning Framework 4, especially concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with the recognition of living cultural practices, clearly departs from policy requirements. Consequently, the combined failure to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The application does not provide a sufficient basis for understanding the true cultural cost of the proposal, and the cultural impacts of the development have not been adequately assessed.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is a significant concern and undermines the integrity of the evaluation process. The developer commissioned a Social Impact Assessment that involved focus groups with local residents; however, the full report has not been made publicly

available. This omission creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to assess the full range of social risks identified through the developer's own research.

Residents are reportedly experiencing tangible stress, anxiety, and concerns regarding the scale and proximity of the proposal. These impacts are based on direct engagement with the community and are not merely speculative. Nevertheless, the lack of access to the complete assessment limits the scrutiny of these findings and hampers the ability to gauge their significance in the decision-making process.

Additionally, there is evidence suggesting that the proposal is seen as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Despite this recognition, these impacts have not been adequately incorporated into the main application or afforded appropriate consideration. The failure to release the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency further undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially in contexts where community character and function may be at stake. By not providing the complete dataset, the application fails to establish a thorough evidential basis for evaluating the balance of benefits and harms.

From a policy standpoint, the application does not adequately demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments are expected to promote positive health outcomes and mitigate harm; however, the evidence currently available points to existing adverse effects that have not been fully disclosed. Without the full assessment, compliance with this policy remains unproven.

The procedural implications of these issues are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material deficiency in the application and a failure to meet the evidential standards required by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, in conjunction with evidence of existing negative impacts, renders the assessment incomplete and unreliable. This situation prevents a lawful determination and reinforces the assertion that the application lacks sufficient information to warrant support.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts related to the proposed development is severely lacking and does not sufficiently acknowledge the extent of change or the sensitivity of the environment involved. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The

addition of large-scale turbines near the shoreline would create a consistent and overwhelming industrial presence, fundamentally altering this character and resulting in a permanent transformation of the landscape that cannot be reversed.

Moreover, the application fails to accurately depict the magnitude of the visual change. The size and proximity of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations, leading to a direct impact on visual amenity and diminishing the defining qualities of naturalness and remoteness. This level of impact and its significance in such a sensitive landscape has not been properly conveyed in the assessment.

Concerns also arise regarding the selection and representation of visual viewpoints within the methodology. There is evidence to suggest that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning significant cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been underestimated, thus compromising the assessment's reliability.

Another critical shortcoming is the failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape that is visually and spatially linked to the Atlantic horizon. Instead of recognising their interdependence, the assessment treats these sites as isolated entities, leading to an incomplete understanding of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the protection of natural areas and historical assets. The level of change proposed is incompatible with the mandate to maintain landscape character, visual amenity, and the setting of culturally important sites. The lack of a comprehensive worst-case assessment further diminishes any assertion of policy compliance.

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

Overall, the assessment inadequately represents the scale of the impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and support the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

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

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

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

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

FISHERIES AND MARINE LIFE

The application presents an inadequate assessment of fisheries and marine life, failing to provide a thorough evaluation of ecological or socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and support a vital fishing industry. However, the proposal does not adequately demonstrate that these crucial uses and habitats can be preserved without significant disruption.

One major concern is the flawed assumption that fishing activities can be shifted

without repercussions. The application lacks evidence showing that alternative fishing grounds are not only available but also accessible and capable of handling increased pressure. This significant omission raises alarm, as displacing fishing activities threatens to lead to overfishing in other areas, potentially resulting in detrimental economic impacts on the local fleet. Without a detailed and evidence-based analysis, the consequences for fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during the construction phase. The extensive use of high-energy hammer piling is likely to create disturbances over vast distances, impacting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population is concerning, yet the application downplays these effects without adequate supporting evidence.

There is a significant inconsistency in the application, as it acknowledges the need for licenses to permit harm to European Protected Species while simultaneously describing impacts as negligible. This contradiction undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, especially where potential harm is expected to necessitate legal authorisation.

Moreover, the assessment does not address cumulative impacts stemming from various pressures, including habitat disturbance, noise pollution, and fishing activity displacement. 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 alignment 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, thereby obstructing any conclusion that the proposal qualifies as sustainable development.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment regarding dark skies and nocturnal wildlife represents a significant flaw within the Environmental Impact Assessment. The coastline of West Lewis is noted for its exceptionally dark skies, which contribute to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, which would be visible over considerable distances, is likely to create a continuous and intrusive "wall of light" effect on the western horizon, fundamentally altering the night-time environment.

The impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors has not been considered in the application. This lack of assessment is particularly troubling given the vital role that dark skies play in the area's identity and the emerging sector of astro-tourism. As a result, there is a significant gap in the overall evaluation of landscape and environmental factors.

Furthermore, there is no evaluation of how the proposed lighting may affect nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit sensitivity to artificial lighting, which can result in disorientation and heightened collision risks. The absence of a lighting impact assessment or a study on phototaxis means that the potential effects of aviation lighting on these species, and consequently their mortality rates, have not been addressed.

This issue is compounded by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activities and their associated risks. Other species, including Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation due to artificial lighting, yet this risk has not been evaluated. The lack of site-specific data collected during night-time creates a critical gap in understanding the ecological impacts.

Without a thorough examination of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites could be adversely affected. The evidential standard required to exclude any adverse effects beyond reasonable scientific doubt cannot be fulfilled, invoking the precautionary principle and thereby preventing a lawful determination.

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

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

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

Any and all windfarms should NEVER be this close to an island, this will hugely effect wildlife. Think correctly, stop thinking about money and start thinking about nature, our life our health. We only have one world. Just move the windfarms out to sea further away out of sight.

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: 5CDB18B8

Member of the public 647

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. It stems from a thorough examination of the Environmental Impact Assessment Report and its accompanying documentation, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural elements. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, relatively untouched natural environment, and rich cultural identity. The dimensions, proximity, and design of this project raise serious questions about its alignment with statutory requirements, national policy, and the principles underpinning sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. Essential environmental data is absent, baseline information is sparse and inconsistent, and critical components of the proposal remain unspecified. The employment of a flexible design framework obscures an understanding of potential significant effects, while the reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the provided documentation does not allow for a comprehensive understanding of environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects are unsupported by solid evidence.

There are evident and substantial conflicts with policy. The proposal appears to contravene the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements intended to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests required for consent and compromise the competent authority's capacity to ascertain the development's acceptability in policy terms.

The proposal's scale is unprecedented for this location, with large turbines sited near the shoreline, provoking substantial concerns regarding landscape capacity, visual dominance, and environmental impact. Collectively, the lack of adequate information, dependence on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is substantially inadequate. This area is characterised as a biologically active marine system, yet the baseline data provided is incomplete. The methodologies employed do not effectively capture the presence, behaviour, and habitat use of relevant species. Consequently, the assessment lacks a reliable evidential basis necessary for evaluating potential impacts.

A significant gap exists concerning otters, a species protected under European law, where their active utilisation of coastal areas for foraging and movement has not been adequately acknowledged or assessed. The failure to consider their core foraging range and behavioural patterns leads to an insufficient evaluation of the potential impacts stemming from construction activities, noise, and increased human activity. Such omissions compromise the conclusions regarding the absence of significant effects on the otter population.

Further issues emerge in the evaluation of basking sharks, as the reliance on aerial surveys introduces a considerable detection bias, particularly given the conditions prevalent in the Atlantic. This methodology is likely to result in an underestimation of their presence, especially in light of established land-based observations that indicate frequent use of these waters. Neglecting to incorporate or adequately consider this data contributes to an incomplete baseline and diminishes the credibility of the assessment's conclusions.

These methodological deficiencies mean that the conclusions asserting negligible or non-significant effects are founded on assumptions rather than solid evidence. Additionally, the lack of comprehensive baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including variations across seasons and broader ecosystem interactions. This creates uncertainty regarding the actual risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not satisfy the stipulations of the Environmental Impact Assessment framework and the National Planning Framework 4, as it fails to properly identify or assess the protected species involved. The uncertainty generated by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is not lawful to grant consent.

In conclusion, the assessment's reliability is fundamentally undermined by incomplete baseline data, flawed methodologies, and unsupported conclusions. These issues hinder a thorough evaluation of impacts on marine ecology and protected species, collectively suggesting that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant shortcomings regarding the ornithological assessment, which is fundamentally flawed due to evident gaps in evidence and inconsistencies that undermine its conclusions. The west coast of the Isle of Lewis is

home to internationally important seabird populations, many of which are already in decline. Yet, the application fails to adequately demonstrate that these species will not be adversely affected. The proposed development is situated within vital foraging areas and migratory pathways; however, the implications of displacement, collision risk, and habitat loss have not been robustly evaluated.

A key contradiction arises within the application, as the developer asserts that there are no significant adverse effects while simultaneously proposing 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 the conclusions drawn are not substantiated by the available evidence. Furthermore, 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 is not adequately accounted for, and the reliance on modelling approaches introduces uncertainty, particularly for species in serious decline like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, particularly where baseline data is lacking and behavioural responses remain poorly understood.

The positioning of turbines within a recognised migratory corridor represents an additional and considerable risk, creating a barrier within a primary flight path for species migrating between the United Kingdom and Iceland. The application fails to thoroughly assess the long-term consequences of sustained mortality within this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the evidential threshold needed to ascertain no adverse effect on the integrity of protected sites. The existence of contradictory conclusions, alongside gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This necessitates the application of the precautionary principle, which hinders a lawful conclusion in favour of consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage and community identity assessment is significantly lacking, failing to acknowledge the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. The

application takes a simplistic view, treating heritage as a collection of disconnected, static elements instead of recognising their ongoing social, cultural, and spiritual roles within the community.

Particularly concerning is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practices; however, the assessment designates them as unchanging features, neglecting their continued usage, significance, and the influence of development on their surroundings. This mischaracterisation leads to an incomplete understanding of cultural impacts and overlooks their importance in community life.

Moreover, the application neglects to evaluate intangible cultural heritage, which encompasses the Gaelic language, traditions, and the enduring connection between the community and the coastal environment. These aspects are crucial to the area's identity and are notably absent from the assessment, indicating a substantial oversight. The cultural implications of the development cannot be accurately assessed without considering these vital elements.

Concerns also arise regarding community rights and participation. The Gaelic-speaking population embodies a distinct cultural identity recognised as Indigenous, yet there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement diminishes the validity of the assessment and fails to uphold established principles of involvement in decisions impacting cultural and environmental matters.

A significant procedural shortcoming is the omission of a compliant Island Communities Impact Assessment, a legal requirement under the Islands (Scotland) Act 2018. Without this assessment, the relevant authorities cannot meet their legal responsibilities to assess the social, cultural, and economic effects on the island community. This absence alone renders any determination unlawful.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, especially concerning the safeguarding of historic assets and places. The oversight of both tangible and intangible heritage, along with the failure to recognise living cultural practices, constitutes a clear deviation from policy mandates.

In summary, the combined failure to evaluate living heritage, intangible cultural values, community rights, and statutory obligations leads to a considerable evidential gap. The cultural impacts of the development remain inadequately assessed, and the application lacks a solid foundation for determining the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding social impacts, health, and wellbeing is a critical issue that undermines the evaluation process. A Social Impact Assessment was commissioned by the developer and involved focus groups with local residents;

however, the full report has not been made public. This significant gap in evidence inhibits both public understanding and the competent authority's ability to grasp the full extent of the social risks identified through the developer's own findings.

Evidence suggests that local residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These effects stem from direct engagement with the community and are therefore based on actual experiences rather than speculation. Yet, the omission of the full assessment stymies proper scrutiny of these findings and hampers the assessment of their implications within the decision-making framework.

Additionally, there are indications that the proposal is viewed as a threat to community identity and cohesion, with the term "cultural loss" featured in the developer's findings. Nonetheless, these impacts have not been adequately included in the main application or given the necessary consideration. By withholding the complete Social Impact Assessment, the true human and social costs of the development remain obscured.

This lack of transparency has repercussions for the Environmental Impact Assessment process. It is vital to fully understand the social, economic, and health impacts associated with developments of this magnitude, especially when community character and functionality are at stake. Without the complete dataset, the application does not present a comprehensive evidential basis to properly weigh the benefits against the potential harms.

From a policy standpoint, the application is insufficient in demonstrating alignment with National Planning Framework 4 concerning health and wellbeing. Development initiatives are required to foster positive health outcomes and mitigate harm; however, the existing evidence reveals adverse effects that have not been fully disclosed. Without the complete assessment, it is impossible to ascertain compliance with these policy requirements.

The procedural ramifications 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 substantial omission in the application, failing to meet the evidential standards established by the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the full Social Impact Assessment, coupled with evidence of current adverse impacts, results in an assessment that is both incomplete and unreliable. This circumstance prevents a lawful determination and reinforces the assertion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal seeks to introduce large-scale turbines along the West Lewis coastline, an area characterised by its open Atlantic horizon, undeveloped nature, and pronounced sense of remoteness. This installation would establish a continuous

industrial presence near the shoreline, leading to a fundamental and irreversible transformation of the landscape. The assessment of the seascape, landscape, and visual impacts associated with this proposal is materially deficient, failing to accurately represent the scale of change or the sensitivity of the receiving environment.

The visual impact of the turbines has not been properly conveyed, with the proximity and scale of these structures likely to dominate views from residential areas, historic sites, and popular coastal locations. This dominance would severely affect visual amenity and degrade the essential qualities of naturalness and remoteness. Additionally, there are significant methodological issues concerning the selection and presentation of visual viewpoints. Evidence suggests that the viewpoints chosen may not adequately capture the most sensitive receptors or worst-case scenarios, especially regarding crucial cultural heritage sites and valued landscapes, which may lead to an understatement of the visual impact and compromise the assessment's reliability.

Furthermore, the assessment neglects to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are situated within a broader landscape that is visually and spatially linked to the Atlantic horizon. Treating these assets as isolated entities undermines a comprehensive evaluation of their settings and cultural significance. The proposed industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are experienced and severing their ties to the natural horizon. This presents not just a visual concern but also a broader cultural and spatial harm that the application has not adequately addressed.

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 proposed scale of change is incompatible with the necessity to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertions of policy compliance.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. The dominant and unavoidable presence of the turbines, due to their height and proximity, indicates that the resulting change is fundamental and permanent, beyond the realm of acceptable mitigation measures. Collectively, the assessment fails to accurately portray the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is at odds with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

The lack of detailed management plans raises significant concerns regarding the proposed works' environmental impact. The proposal entails substantial seabed preparation and installation within a high-energy Atlantic environment; however, it does

not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on unspecified mitigation and contingency measures to be established post-consent, which prevents any meaningful evaluation of their adequacy or effectiveness.

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

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

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

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

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to an active fishing industry and a diverse marine ecosystem. The application does not adequately protect or maintain these crucial habitats and activities from significant disruption. There is a primary issue regarding the presumption that fishing activity can be displaced without consequences. The absence of evidence to suggest that alternative fishing grounds are available, accessible, or capable of handling additional pressure is a critical omission. Such

displacement could lead to overfishing in other areas, potentially harming the local fleet's economic viability.

Moreover, the proposal poses substantial risks to marine species, especially due to underwater noise created during construction. The anticipated high-energy hammer piling could disturb marine life over considerable distances, particularly impacting species like dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application downplays these effects without adequate evidence.

There are inconsistencies within the application regarding the need for licences to permit harm to European Protected Species while simultaneously describing impacts as negligible. This contradiction casts doubt on the assessment's credibility and raises concerns about compliance with the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal authorisation.

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

From a policy standpoint, the application does not adhere to the National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, which hinders any conclusion regarding sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the proposed onshore infrastructure is insufficient and does not adequately address the full range of impacts associated with this integrated project. The offshore turbines and the onshore developments are closely interconnected, yet their assessment has been conducted in isolation, leading to a disjointed analysis that fails to reveal the comprehensive environmental and socio-economic consequences.

The onshore components comprise cabling that crosses protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure traversing sensitive landscapes. Excavation activities are planned in areas of deep peat, particularly within Barvas Moor, a crucial carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, which hinders the ability to fully understand the project’s environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application obstructs a proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be considered in unison; however, the division of offshore and onshore assessments means that the collective impacts on peatlands, habitats, and local communities are not entirely clarified.

There are significant threats to delicate habitats, including machair systems and peatland environments, which are under policy protection. The application does not sufficiently illustrate that the potential impacts on these habitats have been thoroughly evaluated or that adequate avoidance strategies have been implemented, creating a noticeable evidential gap concerning biodiversity protection.

Moreover, the infrastructure routing through operational croft land raises potential issues with existing land use and legal rights. There is a lack of evidence indicating that the requisite consents or procedures have been pursued, which casts doubt on the project's deliverability and lawful execution.

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

Ultimately, the division of project components, the absence of a comprehensive assessment, and the insufficiency of evidence regarding environmental and land use effects render this aspect of the application incomplete and unreliable, thereby obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment concerning dark skies and nocturnal wildlife is a significant omission within the Environmental Impact Assessment, which undermines the integrity of the proposal. The West Lewis coastline is known for its exceptionally dark skies, which contribute significantly to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, which would be visible over long distances, is likely to create an intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Given the critical role dark skies play in the area’s identity and the emerging astro-tourism sector, this oversight represents a notable gap in the overall landscape and environmental assessment.

Equally concerning is the absence of any evaluation regarding the effects on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach’s

Storm Petrel are particularly sensitive to artificial lighting, which can result in disorientation and a heightened risk of collision. The application lacks a lighting impact assessment or a phototaxis study, thereby failing to ascertain how the aviation lighting might affect these species or contribute to increased mortality.

Additionally, the reliance on daytime survey data in the ornithological assessment is inadequate, as it does not account for nocturnal activity or the associated risks. Kittiwakes, for instance, may forage or migrate at night and are also susceptible to disorientation caused by artificial lighting; however, this risk remains unassessed. The failure to gather site-specific night-time data creates a critical void in understanding the ecological impacts of the proposal.

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

From a policy perspective, this omission contradicts the National Planning Framework 4, particularly concerning the protection of natural places and the maintenance of environmental quality. Additionally, it detracts from a comprehensive evaluation of landscape and seascape impacts, as the character of night-time is an essential aspect of the environment.

Collectively, the absence of assessments regarding dark skies and nocturnal wildlife constitutes a significant evidential gap. The deficiency of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of supporting a lawful determination.

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

I fully object to the proposed Spiorad na Mara offshore windfarm. I live in a small village on the west coast of Lewis, and if this development goes ahead, I will see it from my home every single day. I understand the need for renewable energy, but I do not believe that need requires the industrialisation of one of the most unspoilt and culturally significant seascapes left in Scotland.

Visual Impact, Culture, and Landscape Character

The view from our west coast is not just a scenic asset—it is part of who we are. My neighbours and I look out at the same horizon our ancestors did. That open, empty Atlantic defines the character of our community. Spiorad na Mara would place more than thirty massive turbines on that horizon, with blinking lights visible at night and industrial structures breaking the skyline at all hours. That is not a small change. It would fundamentally alter what makes this place feel like home. You cannot separate our culture from this landscape and seascape. Industrialise the view, and you erode the culture with it.

The fact that part of the development was revised to obscure it from view from Uig, a recognised area of natural unspoilt beauty, tells us that it is a known and understood fact that the development itself is totally incompatible with the area in which it will sit, in its sheer size and scale, as well as in its devastating impact.

Marine Life and Wildlife

These waters are alive. Harbour porpoises, dolphins, basking sharks, and seabirds like gannets and divers feed and travel here. The construction and operation of this windfarm would bring constant underwater noise, vibration, and electromagnetic fields. It is difficult to believe that marine life would not be harmed. For those of us who still look to the sea as a source of food and a sign of a healthy environment, this is deeply worrying. We have already seen what industrial activity does to wild places. We should not have to watch it happen here.

Community and Health Impacts

I also worry about what this will do to the people who stay. Low-frequency noise and infrasound from turbines can affect sleep and wellbeing. Shadow flicker during our long summer evenings could make some homes difficult to live in. Our island communities are already small and fragile. We lose young people to the mainland every year. Adding persistent industrial disturbance to daily life will only accelerate that loss. People should not have to choose between their health and staying in the place they love.

Onshore Infrastructure and Peatland Damage

The turbines themselves are only part of the story. The onshore infrastructure—cabling, substations, converter stations, new access tracks—will cut through our peatlands. These are not empty wastelands. They are carbon stores, freshwater sources, and ancient landscapes. Digging them up for industrial corridors will release carbon, damage wildlife habitats, and scar the land for generations. For years during construction, our small single-track roads will be hammered by heavy lorries. That is not progress. That is disruption in the name of profit elsewhere.

Cumulative Impact

This is not one windfarm in isolation. It sits alongside other onshore and offshore proposals across Lewis and the Western Isles. Taken together, they would transform

this part of Scotland into an industrial energy zone. The west coast of Lewis is not suited to that role. It has never been suited to it. Granting this application would say, clearly, that our home matters less than the energy demands of distant cities.

Finally, the name that was clearly chosen in a blatant attempt to make it sound like this monstosity will somehow improve and accentuate the pristine area that it will dominate is incredibly misguided. We can all see right through it for what it is; give it a nice Gàidhlig name and the locals will believe it will actually be of benefit to the area and to the people, and that they were actually considered in all of this.

I do not oppose renewable energy. But I do oppose annihilation of the land and sea scape under the ridiculous guise of "green energy" by this project, in this place, at this scale. I ask you to reject Spiorad na Mara and to protect what remains of our wild, beautiful, and peaceful coastline.

Respectfully, and absolutely opposed.

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: 6FF51660

Member of the public 648

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application. The application is submitted under the marine licensing and Environmental Impact Assessment regimes. A review of the Environmental Impact Assessment Report and related documents has revealed significant deficiencies in planning, environmental considerations, cultural impact, and procedural compliance. The wind farm is proposed to be located off the west side of the Isle of Lewis, which is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

Concerns arise regarding the application's compliance with statutory requirements, national policy, and sustainable development principles. It lacks an adequate evidential basis for a lawful determination. There are critical environmental data gaps, with baseline information being both limited and inconsistent. Additionally, key aspects of the proposal are not clearly defined. The flexible design framework used complicates the assessment of likely significant effects, and the proposed mitigation measures have not yet been specified, making it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible effects lack robust evidence.

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

The scale of this proposal is unprecedented for the area. The large turbines are planned to be positioned close to the shoreline, raising substantial concerns about landscape capacity, visual dominance, and environmental impact. In summary, the lack of sufficient information, dependence on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and unsuitable for a lawful determination. Therefore, the precautionary principle should be applied in this situation.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary transparency and reliability, failing to provide a comprehensive account of the anticipated environmental

effects of the proposal. The flexible Project Design Envelope approach, which does not commit to specific turbine dimensions, layouts, or configurations, introduces significant uncertainty. This uncertainty undermines the integrity of the assessment, meaning that the impacts outlined may not accurately represent the final development, thus preventing both the public and the competent authority from fully understanding the true extent of environmental effects.

The application depends substantially on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the premise that environmental harm will be addressed at a later stage hinders any meaningful evaluation of their effectiveness or the assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures are clearly established before any determination is made.

Furthermore, there are serious evidential deficiencies, including gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially when conclusions regarding negligible or non-significant effects are drawn without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not meet the evidential threshold mandated by the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This triggers the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it has not been shown 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 the unreliability and incompleteness of the Environmental Impact Assessment Report. These deficiencies obstruct a lawful and robust assessment of environmental effects and leave the competent authority unable to make an informed decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives within the application is fundamentally lacking and fails to fulfil the statutory obligations of the Environmental Impact Assessment regime. Rather than delivering a structured and reasoned comparison of viable alternatives with respect to their environmental impacts, the application merely recounts the evolution of the project. This narrative fails to convincingly show that less harmful options have been identified, assessed, and selected over more damaging ones.

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

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

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

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a significant flaw that leads to the overarching conclusion that the application has not been sufficiently evaluated and cannot be lawfully determined.

MARINE ECOLOGY AND PROTECTED SPECIES

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

A significant gap in the assessment concerns otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge or evaluate their active use of coastal regions for foraging and movement. The neglect of their core foraging range and behavioural patterns leads to an inadequate assessment of the

potential impacts arising from construction disturbance, noise, and heightened activity. This oversight undermines the conclusions regarding the absence of significant effects on this species.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is significantly flawed, presenting major evidence gaps and internal contradictions that cast doubt on its conclusions. The development is located within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which is home to internationally important seabird populations that are already in decline. However, the application fails to demonstrate convincingly that these species will not be adversely affected.

There is a fundamental inconsistency in the application where the developer asserts that there are no significant adverse effects while simultaneously making a case for Habitats Regulations derogation, which is only warranted when significant harm is anticipated. This contradiction raises questions about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence provided.

The assessment does not adequately prove that seabirds associated with protected

areas, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical importance of these feeding grounds has not been thoroughly acknowledged, and the reliance on modelling methods introduces uncertainty, especially for species in severe decline like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, particularly in light of incomplete baseline data and a lack of understanding of behavioural responses.

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

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

Furthermore, the identified deficiencies represent a failure to adhere to National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not face adverse impacts places the proposal in direct conflict with national policy.

In summary, the assessment's unreliability stems from internal inconsistencies, methodological flaws, and inadequate evidence. These shortcomings hinder a thorough evaluation of potential impacts and lead to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is significantly flawed, failing to acknowledge the West Lewis coastline as a vibrant cultural landscape where the environment, language, traditions, and community are deeply intertwined. The application approaches heritage in a limited manner, viewing it merely as a collection of isolated, static assets instead of recognising their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming is the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations for burial and spiritual practices, yet they are mischaracterised as mere static features. This oversight neglects their continuing use and meaning, as well as the impact that development may have on their surroundings. Such misrepresentation leads to an incomplete assessment of cultural implications and overlooks their integral role in community life.

Moreover, the application does not take into account the intangible aspects of cultural heritage, including the Gaelic language, local traditions, and the longstanding connection between the community and the coastal environment. These elements are essential to the area's identity but are wholly omitted from the assessment, which is a critical gap. Without addressing these factors, the cultural implications of the development cannot be fully grasped.

Concerns about community rights and engagement further exacerbate the situation. The Gaelic-speaking community has a unique cultural identity that aligns with recognised characteristics of Indigenous Peoples. However, there has been no process of Free, Prior and Informed Consent, which undermines the validity of the assessment and does not adhere to established principles of participation in decisions that affect cultural and environmental interests.

Additionally, there is a significant procedural flaw in the absence of a compliant Island Communities Impact Assessment, a requirement under the Islands (Scotland) Act 2018. The lack of this assessment means that the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering the process unlawful.

From a policy standpoint, these shortcomings directly contradict the National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, as well as the failure to recognise living cultural practices, constitutes a clear violation of policy standards.

In summary, the inadequate assessment of living heritage, intangible cultural value, community rights, and legal responsibilities results in a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application lacks a sufficient foundation for understanding the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment regarding social impacts, health, and wellbeing associated with the proposal is significantly deficient and lacks the necessary transparency for a lawful evaluation. Although a Social Impact Assessment was commissioned by the developer, including focus groups with local residents, the complete report has not been made publicly available. This absence represents a substantial evidential gap that inhibits both public understanding and the competent authority's ability to ascertain the full range of social risks identified in the developer's research.

Residents have expressed measurable stress, anxiety, and concern stemming from the scale and proximity of the proposed development, as evidenced by direct engagement with the community. However, the lack of access to the full assessment hampers proper scrutiny of these findings, limiting the capacity to evaluate their significance in the decision-making process. Furthermore, the proposal is perceived as a threat to

community identity and cohesion, with the developer's findings highlighting a potential "cultural loss." Notably, these impacts have not been adequately addressed within the main application, nor have they been assigned appropriate weight, thereby obscuring the genuine human and social costs associated with the development.

The absence of transparency fundamentally undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health implications is vital for developments of this magnitude, especially when community character and functionality may be jeopardised. By failing to provide the complete dataset, the application lacks a thorough evidential basis necessary for weighing the benefits against the potential harms.

From a policy standpoint, the application falls short of demonstrating adherence to the National Planning Framework 4 concerning health and wellbeing. Development must not only support positive health outcomes but also mitigate harm. The evidence currently available indicates existing adverse effects that have not been fully disclosed, rendering it impossible to demonstrate compliance with this policy without the full assessment.

The procedural ramifications of this situation are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation due to the unavailability of the full Social Impact Assessment. This represents a material omission within the application, failing to satisfy the evidential requirements set forth by the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the complete Social Impact Assessment, in conjunction with the evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This deficiency obstructs a lawful determination and underscores the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts associated with the proposed development is significantly lacking and does not adequately account for the extent of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, undeveloped nature, and profound sense of remoteness. The introduction of large-scale turbines in close proximity to the shoreline would establish a dominant industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

This application fails to accurately convey the magnitude of the visual change that would ensue. Due to their size and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the intrinsic qualities of naturalness and remoteness. There is a notable shortcoming in how this impact is presented, failing to reflect its significance within such a sensitive landscape.

There are also serious methodological issues concerning the chosen visual viewpoints. Evidence indicates that these viewpoints may not sufficiently represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and valuable landscapes. This raises concerns that the magnitude of visual impact may have been understated, compromising the reliability of the assessment.

Additionally, the assessment does not adequately consider the interconnected nature of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting, connected visually and spatially to the Atlantic horizon. The assessment treats these assets as isolated rather than acknowledging their interdependence, leading to an incomplete understanding of impacts on their context and cultural importance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are perceived and severing their link to the natural horizon. This results in not just a visual impact but a wider cultural and spatial detriment that the application has not sufficiently evaluated.

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the safeguarding of natural landscapes and historic assets. The level of change proposed is inconsistent with the imperative to preserve landscape character, visual amenity, and the context of culturally significant sites. Moreover, the lack of a thorough worst-case assessment further weakens any assertion of compliance with policy guidelines.

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

In summary, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and underscore the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The reliance on undefined future measures raises significant concerns, particularly given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. The proposal entails substantial seabed preparation and installation works within a high-energy Atlantic environment, yet it lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that would only be prepared after consent, hindering any meaningful assessment of their

adequacy or effectiveness.

The assessment of construction and pollution risks is incomplete and fails to provide the necessary detail to evaluate likely environmental effects. The application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills but does not supply sufficient information on how these risks will be prevented, controlled, or monitored. Furthermore, there is uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also encompasses potential effects on marine species and habitats identified as sensitive within the wider assessment.

The absence of detailed emergency response procedures compounds these concerns. By postponing contingency planning to a post-consent stage, the application obstructs the evaluation of whether adequate safeguards are in place to respond to pollution events. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures effectively at the point of determination. From a regulatory perspective, the deferral of critical environmental safeguards conflicts with the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation must be assessed prior to consent, and in the absence of this information, a lawful determination cannot be made. The application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application presents an inadequate assessment of fisheries and marine life, failing to provide a thorough evaluation of ecological or socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and support a vital fishing industry. However, the proposal does not adequately demonstrate that these crucial uses and habitats can be preserved without significant disruption.

One major concern is the flawed assumption that fishing activities can be shifted without repercussions. The application lacks evidence showing that alternative fishing grounds are not only available but also accessible and capable of handling increased pressure. This significant omission raises alarm, as displacing fishing activities threatens to lead to overfishing in other areas, potentially resulting in detrimental economic impacts on the local fleet. Without a detailed and evidence-based analysis, the consequences for fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during the construction phase. The extensive use of high-energy hammer piling is likely to create disturbances over vast distances, impacting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population is concerning, yet the application downplays these effects without adequate supporting evidence.

There is a significant inconsistency in the application, as it acknowledges the need for licenses to permit harm to European Protected Species while simultaneously describing impacts as negligible. This contradiction undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, especially where potential harm is expected to necessitate legal authorisation.

Moreover, the assessment does not address cumulative impacts stemming from various pressures, including habitat disturbance, noise pollution, and fishing activity displacement. 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 alignment 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, thereby obstructing any conclusion that the proposal qualifies as sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents a materially incomplete assessment of onshore infrastructure, failing to fully account for the impacts of what constitutes a single integrated project. The offshore turbines are linked with the onshore works, yet these components are evaluated separately, leading to a fragmented approach that obscures the actual extent of environmental and socio-economic effects.

Specifically, the onshore works involve cabling across protected moorland and the construction of a substation near Stornoway, alongside access infrastructure through sensitive landscapes. This construction entails excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. Without a comprehensive assessment of these impacts, the application does not provide a full understanding of the project's overall environmental footprint.

By excluding or deferring the assessment of onshore impacts, the application fails to

allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project be considered collectively; however, the disjointed treatment of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are not adequately understood.

Concerns also arise regarding the potential risks to sensitive habitats, such as machair systems and peatland environments, which are subject to policy protections. The application does not demonstrate that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, thus revealing a significant evidential gap concerning biodiversity protection.

Furthermore, the proposal raises serious questions about carbon balance. The disturbance of peatland can lead to the release of stored carbon, potentially resulting in a carbon debt that contradicts the objectives of renewable energy development. The application does not sufficiently address this matter or show that the overall carbon balance remains favourable.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The 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.

TOURISM

The application presents a significant deficiency in its assessment of tourism impacts, neglecting to evaluate the economic and social consequences for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly pristine landscape, dark skies, and sense of remoteness. Although it is acknowledged that 86% of visitors are attracted by the scenery, there is no quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution from tourism.

Tourism has experienced substantial growth, increasing from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. Nevertheless, the application fails to model how the potential industrialisation of the seascape and deterioration of environmental quality could

affect Tourism Gross Value Added or the broader economic resilience of the region. In the absence of such analysis, it remains uncertain whether the proposed development would yield a net economic benefit or jeopardise an established and expanding sector.

Moreover, the evaluation overlooks the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences, as well as emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a notable gap in understanding the impacts on a recognised and expanding segment of the local economy.

In a context where the island community has limited economic diversification, the oversight in assessing tourism impacts has broader ramifications for employment, local businesses, and community sustainability. The failure to provide a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been appraised as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4, particularly concerning economic impact and the necessity to exhibit a net benefit. Furthermore, it conflicts with strategic objectives that recognise tourism as a priority growth sector, and it does not furnish adequate evidence to enable the competent authority to evaluate the economic consequences of the proposal.

Collectively, the inability to quantify tourism impacts, assess the environmental factors that drive visitor behaviour, and consider the island's economic dependency results in a substantial evidential gap. This limitation undermines the capacity for a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. It echoes the principal issues that led to the rejection of the Lewis Wind Power proposal in 2008, which highlighted unacceptable levels of industrialisation. This new application is presented under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it falls short of these crucial criteria.

There are critical deficiencies in the evidential basis necessary for a thorough evaluation. The application lacks comprehensive baseline data, continues to utilise an undefined design envelope, relies on unspecified mitigation measures, and overlooks significant impact pathways, including those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism consequences. The Environmental Impact Assessment is therefore inadequate, inhibiting a complete understanding of potential significant effects or residual impacts.

Furthermore, clear procedural failings are evident. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory obligation under the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment represents a material omission. These shortcomings hinder the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In addition, the proposal conflicts directly with National Planning Framework 4. It does not demonstrate protection for biodiversity, natural environments, or cultural heritage, fails to show that health and wellbeing impacts are acceptable, and cannot provide evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The required evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, engaging the precautionary principle and obstructing any lawful conclusion that impacts are acceptable.

The proposal would also lead to substantial and irreversible changes in a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual connections, and adverse effects on tourism are permanent consequences that cannot be mitigated to an acceptable degree.

Overall, the application is procedurally and substantively unfit for determination. The significant information deficiencies, combined with conflicts with policy and unresolved environmental risks, prevent a lawful, evidence-based decision. The competent authority must either reject the consent application on these grounds or utilise the relevant regulatory provisions to request the missing information.

It is therefore formally requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

As a teenager growing up in the Hebrides and working in the west side, I believe the integration of the wind farm off the coast would be a disgrace and an eye sore to our island. The impact would be devastating. Leaving a visual and physical impact on residents of the island, leaving people losing sleep and affecting activities such as surfing and fishing and therefore destroying parts of our Island culture. It would also have a huge impact on our local wildlife and seaside, leaving fish poisoned and force them away from their natural habitats.

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: DA10EE13

Member of the public 649

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 frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documents reveals significant deficiencies in planning, environmental management, cultural considerations, and procedural compliance. Situated off the west side of the Isle of Lewis, this region is characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The scale, proximity, and design of the proposed development raise essential concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, while the available baseline information is both limited and inconsistent. Furthermore, many key components of the proposal remain undefined. The flexible design framework impedes a clear assessment of potential significant effects, and the reliance on unspecified mitigation measures prevents any meaningful evaluation of their effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Moreover, there are significant policy conflicts evident in the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent and undermine the ability of the competent authority to determine the development's acceptability in policy terms.

The scale of the project is unprecedented for this area, with large turbines positioned alarmingly close to the shoreline. This introduces considerable concerns about landscape capacity, visual dominance, and overall environmental impact. Together, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance highlight that the application is incomplete and incapable of supporting a lawful determination. Under these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to offer a comprehensive and transparent account of the anticipated environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, lacking commitments to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty and hinders a reliable worst-case scenario analysis. This compromises the assessment's integrity and prevents both the public and the competent authority from grasping the true scale of environmental impacts.

There is an overreliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consequently, consent is sought with the assumption that environmental damage will be remedied later, which obstructs any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contravenes the intent of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established prior to decision-making.

The application also contains notable evidential shortcomings, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, especially when conclusions of negligible or non-significant effects are presented without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot be reconciled with statutory obligations.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species in the West Lewis coastal environment is significantly flawed and does not deliver a thorough or dependable understanding of ecological receptors in this biologically active marine system. The baseline data is notably incomplete, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment fails to offer a solid evidential foundation for evaluating

potential impacts.

A crucial oversight in the application is the treatment of otters, a European Protected Species. The active use of coastal areas by otters for foraging and movement has not been recognised or properly assessed. This disregard for their core foraging range and behavioural patterns means that the possible effects of construction disturbances, noise, and increased activity have not been thoroughly evaluated. This gap undermines any conclusions regarding the absence of significant effects on the species.

Further weaknesses are evident in the evaluation of basking sharks, where reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially in comparison to established land-based observations that indicate frequent utilisation of these waters. The failure to incorporate or adequately consider such information results in an incomplete baseline, thus diminishing the reliability of the conclusions drawn.

The methodological shortcomings lead to findings of negligible or non-significant effects being based on assumptions rather than on sound 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 creates uncertainty regarding the genuine level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4, as it has not correctly identified or assessed protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, consent cannot be granted lawfully.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is significantly flawed, exhibiting notable gaps in evidence and internal inconsistencies that compromise its conclusions. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already declining. However, the application fails to provide the necessary evidence to demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are situated in the development's location, yet the assessment does not adequately evaluate the risks associated with displacement, collision, or habitat loss.

A critical contradiction arises in the application, as the developer asserts that no significant adverse effects will occur while simultaneously advancing a case for derogation under the Habitats Regulations. Such a case is only warranted when significant harm is anticipated, thus questioning the reliability of the assessment and suggesting that its conclusions lack support from the underlying evidence. Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds has not been fully accounted for, and the reliance on modelling methods introduces uncertainty, particularly for species in severe decline, such as Kittiwakes and Fulmars. The methodologies employed may underestimate mortality rates, especially given the incomplete baseline data and the incomplete understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor presents an additional and significant risk, potentially creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to adequately assess the long-term consequences of sustained mortality within this corridor or the possible effects on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold needed to conclude that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, coupled with 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 prevents a lawful conclusion that could support consent.

The identified deficiencies 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.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community rights and engagement is inadequate. The Gaelic-speaking population, recognised as having characteristics of an Indigenous People, has not been consulted appropriately. There has been no process of Free, Prior and Informed Consent, which undermines the validity of the assessment and overlooks important principles of participation in matters that affect cultural and environmental interests.

The treatment of culturally significant sites is also concerning. Cemeteries at Dalmore, Bragar, and Barvas are places of active burial and spiritual significance. However, the

assessment incorrectly categorises these sites as static features. This oversight neglects their ongoing use and the impact of development on their context, leading to a deficient evaluation of cultural effects.

Additionally, the assessment fails to acknowledge intangible cultural heritage, such as the Gaelic language and community traditions, as well as the deep relationship between the community and the coastal environment. These aspects are vital to the area's identity but are not included in the assessment, resulting in a significant gap in understanding the cultural impacts of the development.

A critical procedural failure is the lack of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot adequately evaluate the social, cultural, and economic impacts on the island community, preventing a lawful decision from being made.

From a policy viewpoint, these issues place the proposal at odds with the National Planning Framework 4. The neglect of both tangible and intangible heritage, along with the failure to recognise living cultural practices, demonstrates a clear disregard for policy requirements.

Overall, the lack of consideration for living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been thoroughly assessed, and the application does not offer a solid basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer’s commissioned Social Impact Assessment, which included focus groups with local residents, remains unpublished in its entirety. This lack of transparency signifies a considerable evidential gap, impeding both public and competent authority understanding of the social risks identified through the developer’s own investigation.

Available summaries reveal that residents are already facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are therefore factual rather than speculative. However, the withholding of the complete assessment limits proper scrutiny of the findings and restricts the ability to evaluate their significance within the decision-making framework.

Moreover, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer’s findings. Yet, these social impacts have not been adequately incorporated into the main application or given the necessary weight. The lack of access to the full Social Impact Assessment obscures the true human and social cost associated with the

development.

This absence of transparency fundamentally undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health implications is crucial for developments of this magnitude, especially when community character and functionality may be compromised. The failure to provide the complete dataset means that the application does not offer a comprehensive evidential basis for weighing the benefits against the harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, the available evidence indicates existing adverse effects that have not been fully disclosed. Without the complete assessment, compliance with this policy cannot be established.

The procedural consequences are considerable. The competent authority cannot perform a robust socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a significant omission within the application and indicates a failure to fulfil the evidential requirements outlined in the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, in conjunction with evidence of existing adverse effects, renders the assessment insufficient and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks adequate information to support it.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual impacts and the seascape and landscape effects of the proposed development is fundamentally flawed and does not adequately account for the extent of change or the vulnerability of the environment it will affect. The coastline of West Lewis is characterised by an unspoilt Atlantic horizon, a natural setting, and a pronounced sense of seclusion. The introduction of large turbines in close proximity to the coast would create a persistent and overwhelming industrial presence, which would fundamentally change this character and lead to a permanent and irreversible alteration of the landscape.

The application does not sufficiently capture the extent of the visual change that would occur. Due to their scale and proximity, the turbines would dominate views from residential areas, historic locations, and popular coastal spots, directly impacting visual amenity and undermining the qualities that define the area's naturalness and seclusion. The assessment fails to adequately represent the significance of this impact within the context of such a sensitive landscape.

Methodological issues arise concerning the choice and depiction of visual viewpoints. Evidence indicates that the selected viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, especially regarding significant

cultural heritage sites and valuable landscapes. This oversight risks underestimating the visual impacts, compromising the assessment's reliability.

Furthermore, the assessment neglects to evaluate the interconnectedness between the landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to their wider landscape setting, connected visually and spatially to the Atlantic horizon. By treating these assets as standalone entities, the assessment fails to acknowledge their interdependence, resulting in an incomplete assessment of impacts on their cultural significance and setting.

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 situation represents not just a visual issue but a broader cultural and spatial detriment that has not been adequately examined in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly regarding the safeguarding of natural environments and historical assets. The magnitude of the anticipated changes is incompatible with the need to protect landscape character, visual amenity, and the contexts of culturally significant sites. Additionally, the lack of a comprehensive worst-case assessment further weakens any argument for policy compliance.

It is evident that the impacts noted cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their visual presence would be dominant and unavoidable. The changes wrought would be fundamental and permanent, rather than amenable to reduction through mitigation efforts.

In summary, the assessment fails to accurately depict the scale of the impacts, the sensitivity of the receiving environment, and the interconnectedness of the landscape and heritage. These shortcomings result in an unreliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal is fundamentally flawed due to incomplete assessments of construction and pollution risks. The lack of fully developed Construction Environmental Management Plans and Pollution Prevention Plans means there is insufficient detail to assess likely environmental effects. Substantial seabed preparation and installation work will occur in a high-energy Atlantic environment, yet mitigation and contingency measures are only intended to be created after consent is granted. This approach prevents any real evaluation of their adequacy or effectiveness.

The West Lewis coastline features clean coastal waters and crucial habitats that can be severely impacted by sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it does not adequately outline how these risks will be prevented, controlled, or

monitored. There is also significant uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clear management strategies, it is impossible to ascertain the potential extent, duration, or ecological consequences of these impacts, particularly on the sensitive marine species and habitats identified in the wider assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application undermines the ability to evaluate whether appropriate safeguards are available to address pollution events. This situation creates procedural risk and limits the competent authority's capacity to assess environmental protection measures prior to determination.

From a regulatory standpoint, the deferral of critical environmental safeguards contradicts the Environmental Impact Assessment regime’s requirements. Significant effects and mitigation strategies must be evaluated before consent is granted. The absence of this information means that a lawful determination cannot be achieved. Furthermore, the application fails to meet policy requirements concerning environmental protection and water quality.

In conclusion, the overall absence of defined mitigation measures, detailed management plans, and clarity regarding potential impacts creates a materially deficient assessment. These shortcomings hinder a thorough evaluation of construction and pollution risks, supporting the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposed development presents significant concerns regarding its assessment of fisheries and marine life, which is inadequate and fails to offer a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate how these vital uses and habitats can be preserved or maintained without experiencing considerable disruption.

A major issue arises from the presumption that fishing activities can be relocated without repercussions. There is no evidence provided to suggest that alternative fishing grounds are available or suitable to absorb the additional pressure that would result from this displacement. This lack of information is critical, as the risk of overfishing in other areas is heightened, potentially leading to wider economic repercussions for the local fishing fleet. The absence of a clear and evidence-backed assessment obscures the understanding of impacts on both fisheries and local livelihoods.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over a prolonged period is likely to create disturbances that reach large distances, which may adversely affect species such as dolphins. The predicted disruption to a

considerable portion of the local bottlenose dolphin population raises profound concerns, yet the application downplays these effects without providing sufficient supporting evidence.

Additionally, the application exhibits a notable inconsistency by acknowledging the requirement for licences to permit harm to European Protected Species, while simultaneously claiming that such impacts are negligible. This contradiction undermines the credibility of the assessment and raises doubts regarding compliance with the Habitats Regulations, particularly where anticipated harm necessitates legal authorisation.

The assessment also neglects to consider the cumulative impacts from multiple stressors, including habitat disruption, noise, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the deficiencies in evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal contradictions lead to an assessment that is incomplete and unreliable. These issues impede a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application for the proposed project is fundamentally flawed due to its incomplete assessment of onshore infrastructure, which fails to recognise the interconnectedness of the offshore turbines and onshore works. This fragmented evaluation obscures the true magnitude of environmental and socio-economic impacts. Key onshore components include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure, all of which traverse sensitive landscapes. The planned excavation, particularly in areas of deep peat within Barvas Moor, threatens a significant carbon store and ecologically sensitive habitat. However, the current application does not provide a thorough assessment of these critical impacts, limiting understanding of the overall environmental footprint of the project.

The application’s deferral or exclusion of onshore impacts obstructs proper evaluation of cumulative effects, which is essential for an accurate Environmental Impact Assessment. This process mandates that all elements of a project are considered collectively. The failure to integrate the offshore and onshore assessments means that the combined impacts on peatlands, habitats, and local communities remain largely uncharted.

Furthermore, the proposal poses serious risks to delicate habitats such as machair systems and peatland environments that are already protected under policy. There is insufficient demonstration within the application that the impacts on these vital habitats have been thoroughly evaluated or that effective avoidance measures have been employed. This creates a significant evidential gap regarding biodiversity protection.

Additionally, the disturbance of peatland raises concerns about carbon balance, as it releases stored carbon, potentially incurring a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently tackle this issue nor does it prove that the carbon balance remains favourable.

The routing of the project infrastructure through active croft land also raises potential conflicts with established land use and legal rights. The lack of evidence that the required consents or processes have been initiated calls into question the project's viability and lawful execution.

From a policy standpoint, the disjointed assessment of the project and the failure to safeguard peatlands, habitats, and land use interests are at odds with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be mitigated or avoided further undermines the application.

In summary, the disconnection of project components, the absence of comprehensive assessments, and the lack of substantiated evidence on environmental and land use impacts collectively render this aspect of the application inadequate and unreliable, thereby obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value. However, the Environmental Impact Assessment fails to address the assessment of dark skies and nocturnal wildlife, representing a significant omission. The proposal introduces permanent red aviation lighting that would be visible over long distances, creating a continuous and intrusive “wall of light” effect across the western horizon. This change would fundamentally alter the night-time environment and negatively impact the visual amenity, landscape character, and experiences of residents and visitors. The failure to evaluate these lighting impacts is particularly concerning, especially in relation to the importance of dark skies to the region’s identity and the emerging tourism sector of astro-tourism.

Additionally, the application does not assess the potential impacts on nocturnal wildlife, despite species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel being sensitive to artificial lighting due to phototaxis. This sensitivity can lead to disorientation and increased collision risk, yet the proposal lacks any lighting impact assessment or phototaxis study. Without such evaluations, the application fails

to consider how the proposed aviation lighting may affect these species and contribute to increased mortality rates. Furthermore, the reliance on daytime survey data in the ornithological assessment overlooks nocturnal activity and related risks. Species like Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, and this risk remains unassessed.

The absence of site-specific night-time data creates a critical gap in understanding the ecological impacts. Without a thorough assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and preventing a lawful determination. From a policy standpoint, this omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. It also undermines the overall evaluation of landscape and seascape impacts, as the character of the night-time environment is an essential component of the landscape.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development as required by statutory duties, national policy, and evidential standards. It mirrors the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. This current application, despite being submitted under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, has not adequately addressed those concerns.

A significant lack of reliable evidential basis exists for the application. Critical gaps in baseline data are evident, and the continued use of an undefined design envelope raises questions. Moreover, it relies on unspecified mitigation measures and omits key impact pathways such as those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism. This leads to an incomplete Environmental Impact Assessment, which does not facilitate a comprehensive understanding of the likely significant effects or residual impacts.

The application also exhibits clear procedural shortcomings. The absence 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 full Social Impact Assessment is a material omission. These issues impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

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

Uncertain and potentially significant environmental risks remain. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some cases, 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 regarding the acceptability of impacts.

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

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

In light of these issues, a formal request is made that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 1C496368

Member of the public 650

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under marine licensing and Environmental Impact Assessment regulations. The objection arises from a review of the Environmental Impact Assessment Report and its supporting documents, highlighting significant planning, environmental, cultural, and procedural shortcomings. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns regarding the scale, proximity, and design of the proposal suggest it may not comply with statutory requirements, national policy, or sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination. It is notable that critical environmental data is absent, baseline information is inconsistent and limited, and essential elements of the proposal remain unspecified. The employment of a flexible design framework obscures a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the documentation does not provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust evidence.

There are also significant policy conflicts. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not prove that it can meet national mandates to protect biodiversity, climate interests, and environmental integrity. These conflicts challenge the statutory tests required for consent and hinder the competent authority's capacity to determine the proposal’s acceptability in policy terms.

The unprecedented scale of the proposal, with large turbines positioned near the shoreline, raises serious concerns about landscape capacity, visual dominance, and environmental impact. In light of the lack of adequate information, the dependence on undefined mitigation, evidential weaknesses, and clear non-compliance with policy, it is evident that the application is incomplete and cannot support a lawful determination. Therefore, the precautionary principle must apply in these circumstances.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species presents significant deficiencies that compromise an accurate understanding of the ecological receptors in

the West Lewis coastal environment. This area is known for its sensitivity and biological activity; however, the incomplete baseline data and inadequate methodologies employed do not effectively capture the presence, behaviour, and habitat use of key species. Consequently, the evaluation lacks a reliable evidential basis for assessing potential impacts.

A critical shortcoming is the assessment of otters, a European Protected Species. The application fails to adequately recognise their active use of the coastal regions for foraging and movement. Without a thorough consideration of their core foraging ranges and behaviours, the potential impacts from construction disturbances, noise, and increased activity are not sufficiently evaluated. This lack of detail undermines any assertions regarding the absence of significant effects on otters.

Additionally, there are substantial gaps in the evaluation of basking sharks, with the assessment relying heavily on aerial surveys that introduce notable detection biases, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that show a frequent use of the area by these sharks. The omission of such critical data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological shortcomings lead to findings of negligible or non-significant effects being based on assumptions instead of solid evidence. The lack of comprehensive baseline data also hinders the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty about the true extent of the risks faced by marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the stipulations of the Environmental Impact Assessment regime and National Planning Framework 4, as the assessment of protected species remains inadequate. The uncertainty inherent in these findings obstructs the ability to exclude adverse effects beyond reasonable scientific doubt, thereby activating the precautionary principle. Under such circumstances, granting consent would not be lawful.

In summary, the combination of insufficient baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These shortcomings inhibit a thorough evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the ornithological impacts related to the proposed development is fundamentally flawed, characterised by significant gaps in evidence and internal inconsistencies that undermine its conclusions. It is crucial to note that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. However, the application fails to provide

adequate evidence to demonstrate that these species will not be adversely affected. Additionally, the development is situated within key foraging areas and migratory pathways, yet there is a lack of robust evaluation regarding the implications of displacement, collision risk, or habitat loss.

Within the application lies a fundamental contradiction. The developer asserts that there will be no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which is necessitated only when significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the assessment and suggests that the conclusions presented lack support from the underlying evidence. The assessment does not sufficiently address whether seabirds associated with protected sites such as the Lewis Peatlands and St Kilda will be unaffected. The significance of these vital feeding grounds is not fully considered, and reliance on modelling methods introduces uncertainty, particularly for species experiencing severe decline, such as Kittiwakes and Fulmars. Methodologies employed are likely to underestimate mortality rates, especially when baseline data is incomplete and behavioural responses remain inadequately understood.

Moreover, the placement of turbines within a recognised migratory corridor introduces a substantial risk, effectively creating a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. There is an inadequate assessment of the long-term implications of continued mortality within this corridor, as well as the potential effects on species with relatively small global populations. From a regulatory standpoint, the application does not satisfy the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle and precludes a lawful conclusion that would support consent.

Overall, the deficiencies identified illustrate a failure to comply with National Planning Framework 4 in terms of biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Collectively, these factors render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a thorough evaluation of potential impacts and lead to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The 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.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks the necessary transparency for a lawful evaluation of social impacts, health, and wellbeing. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, but the full report remains unpublished. This creates a significant evidential gap that inhibits both public

understanding and the competent authority's ability to fully grasp the social risks identified through the developer's research.

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

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development introduces large-scale turbines near the West Lewis coastline, which is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. This project threatens to create a continuous industrial presence that would fundamentally alter the landscape, leading to a permanent transformation that could not be reversed. The assessment of potential seascape, landscape, and visual impacts is critically deficient, failing to adequately convey the

extent of this visual change and the sensitivity of the environment.

The scale and proximity of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and eroding the key qualities of naturalness and remoteness. This deficiency extends to the methodologies used in selecting and presenting visual viewpoints, which may not capture the most sensitive receptors or worst-case scenarios, particularly concerning significant cultural heritage sites. As a result, the assessment may have understated the visual impact, calling into question the reliability of its findings.

Furthermore, the application overlooks the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment inadequately treats these sites as isolated rather than recognising their interdependence, which leads to an incomplete evaluation of the impact on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This change represents not just 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, which aims to protect natural places and historic assets. The scope of change proposed is incompatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of compliance with policy.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. This change is substantial and permanent, incapable of being reduced to an acceptable level through mitigation efforts. Collectively, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage, resulting in an unreliable evaluation that reinforces the conclusion that the proposal is not compatible with the protection of this significant landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to disturbance and contamination. Despite this, the assessment of construction and pollution risks is notably incomplete, lacking the necessary detail to evaluate likely environmental effects. The proposal entails substantial seabed preparation and installation works within a high-energy Atlantic environment, yet there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures to be established after consent, which hinders any meaningful assessment of their adequacy or effectiveness.

The application acknowledges various risks, including sediment mobilisation and accidental chemical or oil spills, but it fails to provide adequate detail on prevention, control, or monitoring strategies. Furthermore, there is significant uncertainty concerning the scale and behaviour of sediment plumes that may arise from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies in place, it is impossible to ascertain the extent, duration, or ecological effects of these potential impacts, which also extend to marine species and habitats previously identified as sensitive.

Compounding these issues is the lack of detailed emergency response procedures. The deferral of contingency planning to a post-consent stage prevents an assessment of whether suitable safeguards are available for responding to pollution events, which introduces procedural risk and undermines the competent authority's ability to evaluate environmental protection measures at the determination stage.

From a regulatory standpoint, this deferment of essential environmental safeguards stands in conflict with the requirements of the Environmental Impact Assessment regime. It is mandated that likely significant effects and mitigation measures be assessed prior to consent, and the absence of such information renders a lawful determination unattainable. Additionally, the application fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

Overall, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts lead to a materially deficient assessment. These shortcomings hinder a robust evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

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

The risks posed to marine species are also considerable, particularly due to the

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal is fundamentally flawed due to its incomplete assessment of onshore infrastructure, which fails to recognise the interconnected nature of the offshore turbines and onshore works. This fragmented evaluation obscures the full extent of the environmental and socio-economic impacts associated with this single integrated project.

Critical onshore elements include the installation of cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure that traverses sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, an important carbon store and ecologically sensitive habitat. The lack of a thorough assessment of these impacts hinders a comprehensive understanding of the overall environmental footprint of the project.

By omitting or postponing the evaluation of onshore impacts, the application fails to facilitate an adequate assessment of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered together;

however, the disaggregation of offshore and onshore elements results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

Furthermore, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are afforded policy protection. The application does not convincingly demonstrate that these habitats have been fully evaluated or that appropriate avoidance measures are in place, indicating a significant evidential gap regarding biodiversity protection.

Concerns also arise regarding carbon balance, as the disturbance of peatland may release stored carbon, leading to a potential carbon debt that contradicts the goals of renewable energy development. This issue is not adequately addressed in the application, which fails to prove that the overall carbon balance remains advantageous.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not supply evidence that the necessary consents or processes have been initiated, prompting doubts about deliverability and legal compliance.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value. The proposed development would introduce permanent red aviation lighting that would be visible over long distances, resulting in a continuous and intrusive “wall of light” effect along the western horizon. This change would significantly alter the night-time environment, yet the application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the crucial role of dark skies in the local identity and the emerging tourism sectors, such as astro-tourism, this omission represents a significant gap in the overall landscape and environmental assessment.

Furthermore, there has been no consideration of the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collision. The application lacks a lighting impact

assessment or a phototaxis study, failing to address how the proposed aviation lighting might affect these species or lead to increased mortality.

The reliance on daytime survey data within the ornithological assessment further compounds this issue, as it does not account for nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate at night, are similarly at risk of disorientation from artificial lighting, yet this vulnerability has also gone unassessed. The absence of site-specific night-time data creates a critical void in understanding the ecological impacts of the proposal.

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

From a policy perspective, the omissions present in the application contradict National Planning Framework 4, particularly regarding the protection of natural places and environmental quality. This lack of consideration also undermines the broader evaluation of landscape and seascape impacts, as the character of night-time environments is an integral component of the overall ecosystem.

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

TOURISM

The application lacks a thorough assessment of tourism impacts, neglecting to evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism is crucially reliant on the area's wild coastline, near-pristine landscape, dark skies, and overall sense of remoteness. While it is acknowledged that 86% of visitors are attracted by the scenery, the proposal fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the economic contribution overall.

Significantly, tourism on the Isle of Lewis has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for up to 16% of the island's economy. However, the application does not evaluate how the industrialisation of the seascape and the degradation of environmental quality could impact Tourism Gross Value Added or the wider economic resilience of the area. Without this analysis, it remains unclear whether the proposed development would generate a net economic benefit or threaten a well-established and expanding sector.

Moreover, the assessment does not take into account the importance of environmental

quality in sustaining tourism, particularly the value of unspoiled landscapes and dark skies for visitor experience. This oversight is particularly relevant for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, leaving a notable gap in understanding its effects on a recognized and growing part of the local economy.

In an island community that faces limited economic diversification, the omission of tourism impact assessments has broader ramifications for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been duly considered, as required under the Islands (Scotland) Act 2018.

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

In summary, the lack of a quantified analysis of tourism impacts, the failure to assess the environmental factors that drive visitor behaviour, and the disregard for the island's economic dependency lead to a significant evidential gap. This situation hinders a robust evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

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

I strongly object to this wind farm as it damages culture and heritage of the are and will impact negatively of wildlife and environment.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 14868692

Member of the public 651

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

Dear Sir/Madam

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

The application does not present a sufficient evidential basis for a lawful decision. It is marked by missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The employment of a flexible design framework hinders a clear understanding of potential significant effects, and the dependence on unspecified mitigation measures prevents an assessment of their efficacy. Consequently, the documentation fails to provide a comprehensive or informed view of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

There exist pronounced and substantial conflicts with policy. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not sufficiently demonstrate compliance with national mandates to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for consent and compromise the competent authority's ability to determine the development's acceptability in policy terms.

Moreover, the proposal's scale is unprecedented for this area, with large turbines located in close proximity to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. When considering the lack of adequate information, dependence on undefined mitigation, evidential shortcomings, and evident policy violations, it is clear that the application is incomplete and cannot substantiate a lawful determination. In light of these issues, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally lacking and fails to present a complete, transparent, or reliable overview of the potential environmental effects of the proposed development. The proposal employs a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and obstructs the consistent application of a worst-case scenario. As a result, the assessment's integrity is compromised, meaning the impacts detailed may not accurately represent the final construction, thereby limiting both public understanding and that of the competent authority regarding the true extent of environmental effects.

Moreover, the application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Consent is being requested on the premise that environmental harm will be mitigated at a later stage, which hampers any meaningful evaluation of the proposed measures' effectiveness or the assessment of residual impacts. This postponement of essential information to post-consent phases is procedurally unsound and contradicts the aims of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures are clearly defined prior to decision-making.

Evidential shortcomings are also present, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These issues lead to uncertainty regarding the scale and significance of impacts, particularly where negligible or non-significant effects are claimed without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot meet statutory obligations.

Consequently, the application does not fulfil the evidential standard required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, including requirements pertaining to biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the reliance on an unspecified design envelope, the absence of defined mitigation measures, and existing gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and thorough assessment of environmental effects, placing the competent authority in a position where it cannot make an informed decision based on the information supplied.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species associated with this application is significantly lacking, failing to offer a complete and trustworthy understanding of the ecological receptors within the West Lewis coastal area. This

marine environment is both highly sensitive and biologically active, yet the baseline data presented is incomplete. The methodologies employed do not sufficiently capture the presence, behaviour, and habitat utilisation of various species, which compromises the ability to assess potential impacts reliably.

Particularly concerning is the omission regarding otters, classified as a European Protected Species. The application inadequately acknowledges their active use of the coastal regions for foraging and movement, neglecting to consider their core foraging range and behavioural patterns. Consequently, the potential impacts stemming from construction-related disturbances, noise, and increased human activity have not been thoroughly assessed, undermining claims of no significant effects on this species.

Moreover, the assessment of basking sharks suffers from deficiencies, as it relies heavily on aerial surveys, which introduce substantial detection bias, especially in Atlantic conditions. This method is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate they frequently utilise these waters. The oversight of relevant data leaves the baseline incomplete and further weakens the credibility of the conclusions drawn.

These methodological shortcomings mean that assertions of negligible or non-significant effects rest on unsubstantiated assumptions rather than sound evidence. Additionally, the lack of comprehensive baseline data hampers meaningful evaluations of cumulative and indirect impacts, failing to account for seasonal variations and broader ecosystem interactions. This situation results in uncertainty regarding the actual risks faced by marine species and habitats.

Regulatory obligations are also not met, as the application does not adequately identify or assess protected species, failing to satisfy the standards set by the Environmental Impact Assessment regime and National Planning Framework 4. The uncertainty created prevents the assurance of no adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, lawful consent cannot be granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

displacement, collision, or habitat loss.

There exists a fundamental inconsistency within the application itself. The developer asserts that there will be no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This contradiction raises serious concerns about the reliability of the assessment and suggests that its conclusions lack proper substantiation from the underlying evidence. Additionally, the assessment does not sufficiently establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It does not fully take into account the significance of these feeding grounds, and its reliance on modelling techniques introduces uncertainty, particularly concerning species in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially when baseline data is lacking and behavioural responses are not fully understood.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is alarmingly inadequate, notably failing to acknowledge the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. The application employs a reductive method, viewing heritage merely as a collection of isolated, static entities instead of recognising their ongoing social,

cultural, and spiritual roles within the community.

Particularly troubling is the treatment of culturally significant sites like the cemeteries at Dalmore, Bragar, and Barvas. These sites remain active places for burial and spiritual practices, yet they are mischaracterised as static features, ignoring their continued significance and the implications of development on their settings. This fundamental misunderstanding leads to an incomplete assessment of cultural effects and neglects the essential role these sites play in community life.

Moreover, there is a glaring omission in the consideration of intangible cultural heritage, which encompasses the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are crucial to the area's identity yet are completely overlooked in the assessment. This oversight prevents a comprehensive understanding of the cultural impacts stemming from the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies a unique cultural identity and bears characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. The lack of genuine engagement undermines the credibility of the assessment and overlooks established principles of participation in matters affecting cultural and environmental interests.

A significant procedural shortcoming is the absence of a valid Island Communities Impact Assessment, a legal requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligations to analyse the social, cultural, and economic impacts on the island community. This single omission renders the determination process unlawful.

From a policy standpoint, these shortcomings directly contravene National Planning Framework 4, particularly regarding the safeguarding of historic assets and locations. The failure to incorporate both tangible and intangible heritage, along with the disregard for living cultural practices, constitutes a clear violation of policy mandates.

Ultimately, the combined failure to assess living heritage, intangible cultural value, community rights, and legal obligations culminates in a substantial evidential gap. The cultural implications of the proposed development have not been adequately examined, and the application falls short of providing a solid foundation for understanding the true cultural cost involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing related to the proposed development have not been adequately assessed, revealing a lack of transparency that is crucial for a lawful evaluation. Although the developer conducted a Social Impact Assessment which involved focus groups with local residents, the full report remains unpublished. This absence creates a significant evidential gap that obstructs both public

understanding and the competent authority's ability to grasp the full scope of social risks identified through the developer's own research.

Residents are currently facing measurable stress, anxiety, and concern directly linked to the scale and proximity of the proposal, as indicated by available summaries. These impacts are based on actual engagement rather than speculation. However, the failure to release the complete assessment hampers thorough examination of these findings and restricts the assessment of their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal threatens community identity and cohesion, with the developer's own findings noting a risk of “cultural loss.” Nonetheless, these social impacts have not been adequately incorporated into the main application nor given the necessary consideration. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health effects is vital for developments of this magnitude, especially when community character and functioning could be at stake. Without the complete dataset, the application does not provide a thorough evidential foundation for evaluating the balance between benefits and harm.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development proposals are expected to foster positive health outcomes and avoid harm; however, available evidence suggests existing negative effects that have not been fully revealed. Consequently, without the complete assessment, compliance with this policy remains unproven.

The procedural consequences are considerable. The competent authority is unable to perform a robust evaluation of socio-economic and health implications due to the unavailability of the full Social Impact Assessment. This represents a significant omission within the application and a failure to fulfil the evidential requirements mandated by the Environmental Impact Assessment process.

In summary, the non-disclosure of the full Social Impact Assessment, alongside the evidence of ongoing adverse impacts, renders the evaluation 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 proposal involves the installation of large-scale turbines near the West Lewis coastline, which is characterised by its open Atlantic horizon and undeveloped nature. This change would create a continuous industrial presence that fundamentally transforms the area, leading to a permanent alteration of the landscape. The

assessment of seascape, landscape, and visual impacts associated with this development is significantly lacking, failing to adequately reflect the magnitude of change and the sensitivity of the local environment.

The scale and proximity of the turbines would lead to their dominance in views from residential areas, historic sites, and popular coastal locations. This would adversely affect visual amenity and diminish the naturalness and sense of remoteness that define the region. Furthermore, the assessment does not adequately communicate the significance of these impacts in a landscape that is already sensitive.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. It appears that some viewpoints do not adequately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, which calls into question the reliability of the assessment.

Another critical shortcoming is the failure to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape, tied together through visual and spatial relationships with the Atlantic horizon. The assessment wrongly treats these assets as isolated, leading to an incomplete understanding of the potential impacts on their setting and cultural significance.

The anticipated industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and affecting their connection to the natural environment. This presents not merely a visual concern but also a broader cultural and spatial detriment that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal contravenes National Planning Framework 4 by failing to protect natural places and historic assets. The scale of proposed changes does not align with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Moreover, the lack of a comprehensive worst-case impact assessment further undermines any assertions of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would render their presence unavoidable and dominant. Consequently, the transformation of the landscape would be fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation efforts.

In summary, the assessment does not accurately convey the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and underscore the conclusion that the proposal is at odds with the necessary protection of this significant landscape.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the assessment of fisheries and marine life is insufficient and does not adequately evaluate ecological or socio-economic impacts. The application does not demonstrate that the existing habitats and uses can be protected or maintained without significant disruption.

A major concern is the assumption that fishing activity can be displaced without any consequences. There is no evidence provided that alternative fishing grounds are available, accessible, or able to support increased pressure. This is a significant omission, as displacement could lead to overfishing in other areas and may have wider economic implications for the local fishing fleet. The impacts on fisheries and livelihoods cannot be fully understood without a clear, evidence-based assessment.

The proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling over an extended period is likely to disturb marine life across large distances, affecting species such as dolphins. The expected disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns. Despite this, the application downplays the significance of these effects without sufficient supporting evidence.

There is also a clear inconsistency in the application, as it acknowledges the need for licences to permit harm to European Protected Species while simultaneously describing the impacts as negligible. This contradiction undermines the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, especially where anticipated harm requires legal authorisation.

Furthermore, the assessment overlooks cumulative impacts that may arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a comprehensive evaluation of these combined effects, it is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

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

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the necessary standards for sustainable development when evaluated against national policy,

statutory duties, and evidential standards. It brings back the primary concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the level of industrialisation. This current application is submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

However, the application lacks a complete and trustworthy evidential basis for evaluation. There are significant gaps in baseline data, the design envelope is not clearly defined, and there is an over-reliance on unspecified mitigation measures. Furthermore, important impact pathways, such as those related to nocturnal wildlife, comprehensive onshore infrastructure, and tourism implications, have been excluded. Consequently, the Environmental Impact Assessment is not thorough enough to fully understand potential significant effects or remaining impacts.

Moreover, the process has clear procedural shortcomings. The failure to provide a compliant Island Communities Impact Assessment breaches statutory duties as outlined in the Islands (Scotland) Act 2018, and the lack of a complete Social Impact Assessment is a significant omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

The proposal is also at odds with National Planning Framework 4. It does not adequately protect biodiversity, natural areas, or cultural heritage, fails to demonstrate acceptable health and wellbeing impacts, and cannot prove a net economic benefit due to the lack of tourism impact assessments. The cumulative effects of both offshore and onshore components have not been adequately evaluated, masking potential consequences for peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounds environmental risks, which may be significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some areas, inconsistent. The required evidential threshold to rule out adverse effects with reasonable scientific certainty has not been satisfied, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

Additionally, the proposal would cause considerable and irreversible changes to a highly sensitive landscape. Industrialising the Atlantic-facing coastline, losing dark skies, disrupting cultural and visual connections, and negatively affecting tourism represent permanent impacts that cannot be adequately mitigated.

When considering all these factors, the application is procedurally and substantively unsuitable for determination. The significant gaps in information, along with policy inconsistencies and unresolved environmental risks, obstruct a lawful, evidence-based decision. The competent authority should either refuse consent on these bases or employ the appropriate regulatory measures to obtain 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: C84F22A4

Member of the public 652

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of the proposal, particularly the placement of large turbines in close proximity to the shoreline, introduce significant concerns regarding landscape capacity, visual dominance, and overall environmental impact.

The application lacks a sufficient evidential basis for a lawful determination. There is a notable absence of critical environmental data, while baseline information is both limited and inconsistent. Key aspects of the proposal remain undefined, and the use of a flexible design framework hinders a clear understanding of likely significant effects. Additionally, the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the documentation does not facilitate a full or informed understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

Furthermore, there are substantial policy conflicts. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests necessary for consent and undermine the capacity of the competent authority to deem the development acceptable within policy parameters.

In light of these deficiencies, the absence of adequate information, reliance on undefined mitigation strategies, and evident policy non-compliance collectively demonstrate that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks sufficient transparency and reliability in conveying the anticipated environmental consequences of the proposal. The implementation of a flexible Project Design Envelope, which does not commit to particular turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This ambiguity undermines the integrity of the assessment, leading to

potential discrepancies between the projected impacts and the actual development, thereby hindering both public understanding and the competent authority's ability to gauge the full extent of environmental effects.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents significant shortcomings in the assessment of marine ecology and protected species, which are crucial to understanding the ecological receptors within the West Lewis coastal environment. This area is known for its biological sensitivity and activity, yet the data provided is incomplete. The methodologies employed do not adequately capture the presence, behaviour, and habitat use of species, leading to an unreliable evidential basis for assessing potential impacts.

A notable gap in the assessment concerns otters, a European Protected Species. The

application fails to fully recognise their active utilisation of coastal regions for foraging and movement. This omission regarding their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased human activity have not been sufficiently evaluated. Consequently, this casts doubt on the conclusions drawn about the lack of significant effects on this species.

Additionally, there are considerable deficiencies in the evaluation of basking sharks, as the reliance on aerial surveys introduces a significant detection bias, especially under Atlantic conditions. This methodology is likely to lead to an underestimation of their presence in the waters, particularly when compared to established land-based observations that demonstrate frequent utilisation of these areas. The failure to appropriately consider or incorporate this data contributes to an incomplete baseline, thereby weakening the conclusions drawn in the assessment.

These methodological flaws result in conclusions regarding negligible or non-significant effects that rest on assumptions rather than sound evidence. The lack of adequate baseline data hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This raises uncertainties about the true scale of risks faced by 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 it has inadequately identified and assessed protected species. The resultant uncertainty precludes any reasonable exclusion of adverse effects, thus necessitating the application of the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions significantly undermines the reliability of the assessment. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species and substantiate the overall assertion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

A contradiction exists where the developer asserts there will be no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which should only be necessary if significant harm is anticipated. This inconsistency raises

doubts about the reliability of the assessment and suggests that its conclusions are not underpinned by solid evidence. Furthermore, the assessment does not provide adequate proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not thoroughly acknowledged, and the reliance on modelling techniques adds uncertainty, particularly for species like Kittiwakes and Fulmars that are already in severe decline. The methodologies employed are likely to underestimate potential mortality, especially when baseline data is incomplete and the behavioural responses of the species are not fully understood.

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal seeks to introduce large-scale turbines along the West Lewis coastline, an area characterised by its open Atlantic horizon, undeveloped nature, and pronounced sense of remoteness. This installation would establish a continuous industrial presence near the shoreline, leading to a fundamental and irreversible transformation of the landscape. The assessment of the seascape, landscape, and visual impacts associated with this proposal is materially deficient, failing to accurately represent the scale of change or the sensitivity of the receiving environment.

The visual impact of the turbines has not been properly conveyed, with the proximity and scale of these structures likely to dominate views from residential areas, historic sites, and popular coastal locations. This dominance would severely affect visual amenity and degrade the essential qualities of naturalness and remoteness. Additionally, there are significant methodological issues concerning the selection and

presentation of visual viewpoints. Evidence suggests that the viewpoints chosen may not adequately capture the most sensitive receptors or worst-case scenarios, especially regarding crucial cultural heritage sites and valued landscapes, which may lead to an understatement of the visual impact and compromise the assessment's reliability.

Furthermore, the assessment neglects to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are situated within a broader landscape that is visually and spatially linked to the Atlantic horizon. Treating these assets as isolated entities undermines a comprehensive evaluation of their settings and cultural significance. The proposed industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are experienced and severing their ties to the natural horizon. This presents not just a visual concern but also a broader cultural and spatial harm that the application has not adequately addressed.

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 proposed scale of change is incompatible with the necessity to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertions of policy compliance.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. The dominant and unavoidable presence of the turbines, due to their height and proximity, indicates that the resulting change is fundamental and permanent, beyond the realm of acceptable mitigation measures. Collectively, the assessment fails to accurately portray the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is at odds with the necessary protections for 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 application presents significant deficiencies in its assessment of fisheries and marine life, failing to offer a robust evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry. However, the application does not adequately demonstrate how these uses and habitats can be safeguarded or maintained without considerable disruption.

A critical flaw lies in the assumption that fishing activity can be displaced without repercussions. The application lacks evidence to confirm that alternative fishing grounds are not only available but also accessible and capable of bearing additional pressures. This significant omission raises the risk of overfishing in other areas, which could lead to broader economic consequences for the local fishing fleet. Consequently, without a clear and evidence-based assessment, understanding the impacts on fisheries and local livelihoods is impossible.

Moreover, the proposal poses considerable risks to marine species, especially through the underwater noise produced during construction. The use of high-energy hammer

piling over prolonged periods is likely to disturb marine life over large distances, notably affecting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming; yet, the application minimises these effects without adequate supporting evidence.

There is also a troubling inconsistency in the application regarding the acknowledgment of the need for licences to permit harm to European Protected Species, while simultaneously asserting that the impacts are negligible. This contradiction undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, particularly where anticipated harm necessitates legal authorisation.

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

From a policy standpoint, the application fails to comply with the National Planning Framework 4 and the National Marine Plan. It does not demonstrate that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thus obstructing any conclusion that the proposal aligns with the principles of sustainable development.

In summary, the absence of evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies ultimately render the assessment incomplete and unreliable. These shortcomings prevent any meaningful evaluation of the impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

evaluated.

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

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

Moreover, this oversight contradicts the National Planning Framework 4 regarding the protection of natural places and environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the night-time character is an integral aspect of the environment. Collectively, the lack of evaluation concerning dark skies and nocturnal wildlife creates a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and inadequate for a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a serious shortcoming in meeting the requirements for sustainable development, as judged against statutory obligations, national policy, and evidential standards. The application mirrors the key issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This time, it is put forward under a more stringent policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

Crucially, the application lacks a complete and reliable evidential basis necessary for determination. There are significant gaps in baseline data, an unspecified design envelope, and mitigation measures that are not clearly defined. Additionally, it omits vital impact pathways, including those relating to nocturnal wildlife, comprehensive onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is inadequate, preventing a full understanding of potential significant effects or residual impacts.

Moreover, there are significant procedural failings. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the failure to provide the full Social Impact Assessment is a material omission. These shortcomings hinder the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal contravenes the National Planning Framework 4 by failing to protect biodiversity, natural areas, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable, nor can it show a net economic benefit owing to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been thoroughly assessed, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially severe. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain instances, inconsistent. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and hindering a lawful conclusion regarding the acceptability of impacts.

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

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

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

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: 390A615B

Member of the public 653

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment frameworks. The objection is informed by a comprehensive review of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies in planning, environmental considerations, cultural implications, and procedural compliance. The site of the proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and distinct cultural identity. Concerns arise regarding the compatibility of the proposal with statutory obligations, national policies, and the overarching principles of sustainable development, particularly considering its scale, proximity to the shoreline, and design.

The application lacks an adequate evidential basis necessary for a lawful determination. Essential environmental data is absent, baseline information is both limited and inconsistent, and several critical elements of the proposal remain undefined. The flexible design framework employed obscures the potential significant effects, while the reliance on unspecified mitigation measures raises questions about their efficacy. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are unsupported by credible evidence.

Moreover, 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 places, cultural heritage, and public health and wellbeing. It does not sufficiently demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for consent and inhibit the competent authority from reaching a conclusion that the development is acceptable from a policy perspective.

The unprecedented scale of the proposal raises additional concerns due to the large turbines being positioned in close proximity to the shoreline, leading to significant issues regarding landscape capacity, visual impact, and overall environmental consequences. Collectively, the lack of comprehensive information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy violations indicate that the application is incomplete and fails to 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 transparent account of the likely environmental impacts of the proposal. The flexibility in the Project Design Envelope, which does not commit to specific dimensions or layouts of turbines, introduces uncertainty. This makes it difficult to apply a worst-case scenario consistently. As a result, the assessment's integrity is undermined, and the information presented may not accurately reflect the eventual development. This situation hampers both public understanding and the competent authority's ability to gauge the true environmental effects.

The application depends on mitigation measures, monitoring strategies, and management plans that are still to be defined. Seeking consent under these conditions means that potential environmental harm may be addressed later, complicating any assessment of effectiveness or residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which requires that significant effects and mitigation strategies are clearly established before any decision is made.

There are also considerable gaps in baseline data, limitations in methodology, and a reliance on assumptions instead of site-specific evidence. These deficiencies lead to uncertainty about the scale and significance of the impacts, especially where claims of negligible or non-significant effects lack robust data to back them up. Insufficient information obstructs a clear understanding of cumulative and worst-case impacts, fostering scientific uncertainty that does not meet statutory obligations.

Consequently, the application does not meet the evidential threshold outlined in the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to comply with National Planning Framework 4, which includes requirements for biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been thoroughly assessed or that adequate safeguards are established.

Overall, the reliance on an undefined design envelope, the lack of specified mitigation measures, and gaps in baseline data contribute to an unreliable and incomplete Environmental Impact Assessment Report. These issues hinder a lawful and thorough evaluation of environmental effects, leaving the competent authority unable to make a well-informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to meet the statutory requirements of the Environmental Impact Assessment regime, primarily due to an inadequate assessment of alternatives. Instead of presenting a structured and reasoned comparison of realistic alternatives based on their environmental effects, it offers a narrative account of the project's evolution. This approach does not adequately demonstrate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

Furthermore, there is a lack of transparent or evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has thoroughly considered the possibility of positioning turbines further offshore, which would likely mitigate visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, along with the critical importance of proximity to shore in evaluating impact, means that the absence of such analysis prevents any conclusion that the proposed siting is the least damaging option available.

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

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

From a policy standpoint, this deficiency raises concerns regarding compliance with National Planning Framework 4, particularly in relation to the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a material omission that further supports the overall conclusion that the application has not been adequately evaluated and cannot lead to a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate and does not furnish a comprehensive or dependable understanding of the ecological receptors present in the West Lewis coastal environment. This area is characterised as a highly sensitive and biologically rich marine system, yet the baseline data provided is insufficient and the methodologies utilised do not effectively capture the presence, behaviour, and habitat usage of various species. Consequently, the assessment falls short of providing a solid evidential foundation for evaluating the impacts of the proposed developments.

A significant oversight involves otters, which are classified as a European Protected Species. The application inadequately acknowledges and evaluates the active utilisation of coastal areas by otters for foraging and movement. Without a proper assessment of their core foraging ranges and behavioural patterns, the potential

consequences of construction disturbances, noise, and increased activity have not been thoroughly examined. This lack of consideration undermines any conclusions drawn regarding the absence of significant effects on this species.

Furthermore, the assessment of basking sharks is compromised by the reliance on aerial surveys, which introduce considerable detection bias, particularly under Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate frequent utilisation of these waters. By failing to incorporate or adequately evaluate such data, the assessment produces an incomplete baseline, which diminishes the reliability of its conclusions.

The methodological shortcomings result in conclusions about negligible or non-significant effects being based more on assumptions than on solid evidence. The lack of sufficient baseline data also hampers any meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates significant uncertainty regarding the actual scale of risk posed to marine species and habitats.

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

In summary, the combination of insufficient baseline data, flawed methodologies, and unsupported conclusions collectively undermines the reliability of the assessment. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, leading to the overarching conclusion that the application lacks an adequate evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant shortcomings, characterised by internal inconsistencies and gaps in evidence that undermine its findings. The application does not sufficiently demonstrate that the internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, will remain unaffected by the proposed development. Key foraging areas and migratory pathways are situated within the development site, yet there is inadequate evaluation of the potential implications related to displacement, collision risk, or habitat loss.

A notable contradiction arises within the application, as the developer asserts that there will be no significant adverse effects, while also proposing a Habitats Regulations derogation case, which is typically necessitated only when significant harm is anticipated. This inconsistency raises questions about the credibility of the assessment

and suggests that the conclusions drawn lack support from reliable evidence. Furthermore, the assessment does not sufficiently address the potential impacts on seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not thoroughly examined, and the reliance on modelling techniques introduces uncertainty, particularly for species like Kittiwakes and Fulmars, which are experiencing severe declines. The methodologies employed may likely underestimate mortality, especially given the incomplete baseline data and limited understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional significant risk, essentially creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor and the potential effects on species with relatively small global populations have not been adequately assessed. From a regulatory standpoint, the application falls short of meeting the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with gaps in data and limitations in modelling, indicates that the assessment does not achieve the standard of proof beyond reasonable scientific doubt. This situation engages the precautionary principle, resulting in an unlawful conclusion regarding consent.

In addition, 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 affected places the proposal in direct contradiction with national policy. Collectively, these factors contribute to the assessment being unreliable, primarily due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. Consequently, these shortcomings hinder a thorough evaluation of impacts and lead to the overall conclusion that the application fails to meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning cultural heritage and community identity is deeply flawed and overlooks the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are intertwined. The application simplifies heritage to a collection of isolated, unchanging features and neglects to recognise their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is how culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas, are treated. These locations serve as active burial and spiritual sites, yet the assessment fails to acknowledge their continued use and significance, instead reducing them to static features. This misrepresentation leads to an inadequate understanding of cultural impacts and ignores their integral role in community life.

Moreover, the application neglects to evaluate intangible cultural heritage such as the Gaelic language, local traditions, and the enduring relationship the community has with the coastal environment. These elements are vital to the area's identity and their exclusion signifies a considerable oversight. Without incorporating these factors, the true cultural impact of the development remains unmeasured.

Concerns also arise regarding community engagement and rights. The Gaelic-speaking population possesses a unique cultural identity that aligns with Indigenous Peoples, yet there has been no Free, Prior and Informed Consent process conducted. This lack of genuine engagement undermines the validity of the assessment and fails to honour established principles of participation in decisions that affect cultural and environmental matters.

A significant procedural flaw is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment means that the responsible authority cannot meet its legal obligation to evaluate the social, cultural, and economic ramifications for the island community. This alone hinders a lawful decision.

From a policy standpoint, these deficiencies contradict the National Planning Framework 4, specifically regarding the preservation of historic assets and places. The disregard for both tangible and intangible heritage, along with the failure to recognise living cultural practices, clearly deviates from policy mandates.

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory obligations culminates in a considerable evidential void. The cultural ramifications of the development have not been thoroughly examined, and the application fails to furnish a solid foundation for understanding the genuine cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer’s commissioned Social Impact Assessment, which included focus groups with local residents, remains unpublished in its entirety. This lack of transparency signifies a considerable evidential gap, impeding both public and competent authority understanding of the social risks identified through the developer’s own investigation.

Available summaries reveal that residents are already facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are therefore factual rather than speculative. However, the withholding of the complete assessment limits proper scrutiny of the findings and restricts the ability to evaluate their significance within the decision-making framework.

Moreover, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer’s

findings. Yet, these social impacts have not been adequately incorporated into the main application or given the necessary weight. The lack of access to the full Social Impact Assessment obscures the true human and social cost associated with the development.

This absence of transparency fundamentally undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health implications is crucial for developments of this magnitude, especially when community character and functionality may be compromised. The failure to provide the complete dataset means that the application does not offer a comprehensive evidential basis for weighing the benefits against the harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, the available evidence indicates existing adverse effects that have not been fully disclosed. Without the complete assessment, compliance with this policy cannot be established.

The procedural consequences are considerable. The competent authority cannot perform a robust socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a significant omission within the application and indicates a failure to fulfil the evidential requirements outlined in the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, in conjunction with evidence of existing adverse effects, renders the assessment insufficient and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks adequate information to support it.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed application involves the introduction of large-scale turbines close to the West Lewis coastline, which is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. This development would create a dominant industrial presence that would fundamentally alter the existing landscape, resulting in a permanent and irreversible transformation.

The assessment conducted fails to adequately represent the magnitude of the visual change that would occur. Given their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. The report does not effectively convey the significance of these impacts within the context of such a sensitive landscape.

Concerns also arise regarding the methodology used in the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not accurately reflect the most sensitive receptors or worst-case scenarios, especially concerning key

cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been underestimated, compromising the assessment's reliability.

Additionally, there is a notable deficiency in addressing the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to the wider landscape and are visually and spatially linked to the Atlantic horizon. However, the assessment treats these sites as isolated, failing to recognise their interdependence and leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The anticipated industrialisation of the seascape would sever these vital relationships, altering how heritage assets are experienced and disrupting their connection to the natural horizon. This not only represents a visual impact but also signifies broader cultural and spatial harm, which has not been sufficiently addressed in the application.

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

It is evident that the identified impacts cannot be effectively mitigated. Due to the turbines' scale, height, and proximity, their presence would be dominant and unavoidable. Consequently, the changes resulting from this development would be fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

In summary, the assessment inadequately represents the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is materially deficient, lacking the necessary detail to evaluate likely environmental effects. The proposal necessitates extensive seabed preparation and installation works within a high-energy Atlantic environment. However, it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be formulated post-consent, which hinders any meaningful assessment of their adequacy or effectiveness.

The 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 significant habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment

mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

Moreover, there is uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without comprehensive 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 previously identified as sensitive within the broader assessment.

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

From a regulatory standpoint, the deferment of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated prior to consent, and the absence of such information precludes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, insufficient management plans, and uncertainty regarding potential impacts collectively render the assessment inadequate. These deficiencies inhibit a robust evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents significant inadequacies in its assessment of fisheries and marine life, failing to deliver a thorough evaluation of ecological and socio-economic impacts. Off the West Lewis coast, there exists a vibrant marine ecosystem alongside an active fishing industry, yet the proposal does not adequately demonstrate how these vital habitats and uses can be preserved without considerable disruption.

A major concern lies in the assumption that fishing activities can simply be relocated without adverse effects. The application does not provide any evidence suggesting that alternative fishing grounds are available, accessible, or capable of accommodating additional fishing pressure. This gap in information is critical, as such displacement poses a risk of overfishing in other areas, potentially leading to severe economic repercussions for the local fishing fleet. The absence of a clear, evidence-based assessment inhibits a comprehensive understanding of the potential impacts on fisheries and local livelihoods.

Moreover, the proposal carries substantial risks for marine species, particularly due to

underwater noise created during construction activities. The anticipated use of high-energy hammer piling over an extended timeframe is likely to disrupt marine life across extensive areas, notably affecting species like dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises profound concerns, yet the application seems to underestimate the severity of these impacts, lacking adequate supporting evidence.

The application exhibits a troubling inconsistency by acknowledging the necessity for licenses to permit harm to European Protected Species, while simultaneously downplaying the anticipated impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious questions regarding compliance with the Habitats Regulations, particularly where harm is expected at levels warranting legal authorisation.

Additionally, the evaluation does not adequately address cumulative impacts stemming from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a holistic assessment of these combined effects, the overall consequences for marine ecosystems and socio-economic conditions remain indeterminate.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not adequately show that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, precluding any assertion that the proposal qualifies as sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed project includes significant onshore infrastructure components, such as cabling across protected moorland and the construction of a substation near Stornoway, along with related access infrastructure that traverses sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, which serves as a crucial carbon store and ecologically delicate habitat. The current application lacks a thorough assessment of the environmental impacts resulting from these onshore works, obscuring the true extent of the project's overall environmental footprint.

The onshore and offshore components of this single integrated project are intrinsically linked yet assessed separately. This fragmented approach fails to accurately capture the cumulative impacts on peatlands, habitats, and local communities, thus preventing a proper evaluation of these combined effects. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively, and the

current separation of onshore and offshore assessments results in a lack of understanding of the overall consequences.

There are considerable risks posed to sensitive habitats, including machair systems and peatland environments, which are protected under policy frameworks. The application does not adequately demonstrate that these habitats have been fully assessed for potential impacts or that effective avoidance measures have been implemented. This evidential gap raises concerns regarding biodiversity protection.

Furthermore, the proposed routing of infrastructure through active croft land introduces possible conflicts with existing land use and legal rights. The application fails to present evidence that the necessary consents or processes for this routing have been initiated, leading to doubts about the deliverability and lawful execution of the project.

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

Overall, the incomplete assessment stemming from the separation of project components, the absence of a comprehensive evaluation of environmental impacts, and insufficient evidence regarding land use effects render this part of the application unreliable and not suitable for lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to address the assessment of dark skies and nocturnal wildlife, representing a significant oversight. The West Lewis coastline boasts exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism appeal. The introduction of permanent red aviation lighting, visible from considerable distances, would create a continuous and intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

The application neglects to evaluate the impacts of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of consideration is critical, given the significance of dark skies for the identity of the area and the emerging sector of astro-tourism. Such omissions create a distinct gap in the overall landscape and environmental assessment.

Moreover, there is no analysis of the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly susceptible to artificial lighting due to phototaxis, which can lead to disorientation and an increased risk of collision. The application does not provide any lighting impact assessment or phototaxis study, failing to evaluate how aviation lighting might affect

these species or lead to increased mortality rates.

This oversight is further exacerbated by the dependence on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or the associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been investigated. The lack of site-specific night-time data results in a crucial gap in understanding the ecological impacts.

Without an assessment of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites could be adversely affected. The evidential standard required 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 is inconsistent with National Planning Framework 4, which pertains to the protection of natural environments and the quality of the surroundings. Additionally, it undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time is an integral aspect of the environment.

In summary, the absence of any evaluation regarding dark skies and nocturnal wildlife represents a substantial evidential gap. The failure to provide baseline data, impact modelling, and species-specific analyses renders the application incomplete and incapable of facilitating a lawful determination.

TOURISM

The assessment regarding tourism impacts is severely inadequate and does not adequately evaluate the economic and social repercussions for a crucial part of the Isle of Lewis's economy. The island's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness are vital to tourism, which thrives on these natural attributes. The application recognises that 86% of visitors are attracted by the scenery, yet it neglects to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contributions.

Tourism has seen remarkable growth, rising from £65 million in 2017 to more than £81.5 million, while also supporting over 1,000 jobs and making up to 16% of the island's economy. However, the application does not assess how the industrialisation of the seascape and degradation of environmental quality would affect Tourism Gross Value Added or the wider economic resilience of the area. Without this analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or harm an established and flourishing sector.

The assessment further neglects to recognise the crucial role of environmental quality in tourism, particularly the significance of unspoiled landscapes and dark skies for visitor satisfaction and the growth of niche markets like nature-based tourism and

astro-tourism. The failure to include a Dark Skies Assessment exacerbates this deficiency, leaving a substantial gap in understanding the impacts on a recognised and expanding segment of the local economy.

Given the island community's limited economic diversification, the lack of assessment regarding tourism impacts has broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated as mandated under the Islands (Scotland) Act 2018.

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

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

SUMMARY

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

There are critical deficiencies in the evidential foundation provided for the determination of the application. Key baseline data is missing, the design envelope remains undefined, and there is an over-reliance on unspecified mitigation measures. Additionally, the application neglects crucial impact pathways related to nocturnal wildlife, comprehensive onshore infrastructure, and potential effects on tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a thorough understanding of likely significant effects or residual impacts.

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

The proposal stands in stark contradiction to the National Planning Framework 4. It

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

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

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

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

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

Additional Comments

These projects are owned by foreign countries who do not know or live in the country. The impact on infrastructure is immense as roads have to be built/rebuilt to transport the components of the windmills which are not recyclable. They are an eyesore & have ruined the landscape of thousands of places in Scotland. They have a major negative impact on tourism. They destroy the natural habitat of birds, marine life and areas of scientific interest. Then they have to built battery storage facilities which are highly volatile, high risk of fire and toxic fumes. These companies bring in Romanian/Albanian workers for cheap labour & these workers are then housed in converted containers which take over fields. Woodlands are ripped out without considering the creatures, non human, who live there.
Windmills & battery storage plants have absolutely destroyed South Lanarkshire farms & ancient woodlands- do not let this happen to other areas of outstanding beauty. Scotland is being bought, piece by piece, by other countries for their financial gain and the destruction of Scotland as we know it.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 7DBEFA4C

Member of the public 654

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application lacks a comprehensive assessment of alternatives, which does not satisfy the statutory requirements of the Environmental Impact Assessment regime.

Instead of offering a structured and reasoned comparison of realistic alternatives based on environmental impacts, it provides a narrative detailing the project's evolution. This method fails to demonstrate that less harmful options have been sufficiently identified, evaluated, and chosen over more damaging solutions.

There is a notable absence of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has adequately considered positioning turbines further offshore, which could potentially reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the crucial role that proximity to the shore plays in determining impacts, the lack of such analysis prevents any determination that the proposed siting is the least damaging option.

These shortcomings extend to the cable routing and landfall assessment, where there is inadequate evidence that alternative routes have been thoroughly examined to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The failure to present a clear avoidance strategy and the lack of comparative analysis suggest that mitigation by design has not been employed, resulting in a reliance on post-design mitigation measures instead.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed assessment of marine ecology and protected species is fundamentally inadequate, lacking a comprehensive and reliable understanding of the ecological receptors present within the West Lewis coastal environment. This area is a biologically active marine system, yet the baseline data provided is insufficient, and the methodologies employed do not effectively capture crucial information regarding species presence, behaviour, and habitat utilisation. Consequently, the assessment fails to establish a robust evidential foundation for evaluating potential impacts.

Significant omissions are evident, particularly concerning otters, which are classified

as a European Protected Species. The application does not adequately recognise or assess their utilisation of coastal areas for foraging and movement. By neglecting to consider their core foraging range and behavioural patterns, the potential implications of construction disturbance, noise, and increased human activity remain inadequately evaluated. This oversight undermines any claims regarding the absence of significant effects on this species.

Further issues are present in the assessment of basking sharks, where an overreliance on aerial surveys leads to considerable detection bias, especially under Atlantic conditions. Such an approach is likely to underestimate the presence of these sharks, particularly when compared to established land-based observations that indicate their frequent use of these waters. The failure to appropriately incorporate or consider this data results in an incomplete baseline, thereby weakening the reliability of the conclusions drawn.

These methodological shortcomings mean that any conclusions suggesting negligible or non-significant effects are based more on assumptions than on sound evidence. The lack of adequate baseline data further obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation generates uncertainty about the actual risk posed to marine species and habitats.

From a regulatory viewpoint, the application does not fulfil the requirements set by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced prevents any exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the precautionary principle. Given these circumstances, it is not lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presented in the application is fundamentally flawed, featuring significant evidence gaps and internal contradictions that compromise its conclusions. The assessment fails to adequately demonstrate that the internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, will not be adversely affected. Key foraging areas and migratory pathways are located within the development site, yet the implications of displacement, collision risk, and habitat loss are not thoroughly evaluated.

A notable inconsistency arises from the developer's assertion of no significant adverse effects alongside the advancement of a Habitats Regulations derogation case, which is applicable only when significant harm is anticipated. This contradiction raises

questions regarding the assessment's reliability and suggests that the conclusions drawn lack robust support from the underlying evidence. Moreover, the assessment does not convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The crucial nature of these feeding grounds is insufficiently acknowledged, and the reliance on modelling methods introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. Given that baseline data is often incomplete and behavioural responses remain poorly understood, the methodologies employed are likely to underestimate potential mortality rates.

Furthermore, the placement of turbines within a recognised migratory corridor presents an additional and serious risk. This positioning effectively obstructs a primary flight path used by birds migrating between the United Kingdom and Iceland. The application inadequately addresses the long-term consequences of continued mortality in this corridor or the impacts on species with limited global populations.

From a regulatory standpoint, the application does not satisfy the evidential standards necessary to ascertain no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, alongside data deficiencies and modelling limitations, fails to meet the requisite standard of beyond reasonable scientific doubt. This situation invokes the precautionary principle and obstructs a lawful conclusion supporting consent.

The identified deficiencies also indicate non-compliance with National Planning Framework 4, particularly regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected positions the proposal directly against national policy. Collectively, these flaws render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. Such shortcomings hinder a thorough evaluation of impacts and culminate in the overall conclusion that the application does not fulfill the statutory requirements essential for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal presents significant challenges regarding the assessment of social impacts, health, and wellbeing, which are materially deficient and lack the necessary transparency for lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report has not been made available. This omission creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to grasp the complete range of social risks highlighted by the developer's own research.

Residents are already reporting measurable levels of stress, anxiety, and concern associated with the scale and proximity of the proposed development. These impacts stem from direct engagement and are not mere speculation. The failure to disclose the full assessment limits the capacity for thorough scrutiny of the findings and restricts

the evaluation of their significance within the overall decision-making process.

Moreover, there is clear evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” cited among the developer’s findings. However, these impacts have not been sufficiently integrated into the main application nor afforded the appropriate weight they deserve. The withholding of the complete Social Impact Assessment obscures the true social and human costs associated with the development.

This lack of transparency adversely affects the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health ramifications is vital for developments of this magnitude, particularly when they may disrupt community character and function. By failing to provide the complete dataset, the application falls short of establishing a thorough evidential basis for weighing the potential benefits against the harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. The development is required to promote positive health outcomes and mitigate harm; however, the evidence at hand reveals existing adverse effects that have not been fully disclosed. Without the complete assessment, the application cannot claim compliance with this crucial policy.

The procedural implications 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 fails to meet the evidential requirements stipulated by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with clear evidence of existing adverse impacts, results in an incomplete and unreliable evaluation. This undermines the ability to reach a lawful determination and supports the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed application fails to properly assess the impacts on seascape, landscape, and visual aspects, leading to significant deficiencies in understanding the extent of change and the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. Large-scale turbines close to the shoreline would introduce a dominant industrial presence that would fundamentally change this character, resulting in a permanent and irreversible transformation of the landscape.

The visual changes that would arise from the installation of these turbines are not adequately represented in the application. Due to their scale and proximity, the turbines would overshadow views from residential areas, historic sites, and popular

coastal locations. This would diminish visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not sufficiently capture the significance of this impact within such a sensitive landscape.

Concerns also exist regarding the methods used to select and present visual viewpoints. Evidence indicates that the viewpoints may not encompass the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. As a result, the magnitude of the visual impact may be understated, which casts doubt on the reliability of the assessment.

Moreover, the application neglects to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape linked visually and spatially to the Atlantic horizon. Treating these assets in isolation disregards their interdependence, leading to an incomplete assessment of impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the protection of natural places and historic assets. The extent of change proposed is not in alignment with the requirement to preserve landscape character, visual amenity, and the context of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. Consequently, the resultant change is fundamental and permanent, with no possibility of reduction to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The incomplete assessment of construction and pollution risks does not provide adequate detail for evaluating likely environmental effects. This proposal entails significant seabed preparation and installation activities in a high-energy Atlantic environment, yet it lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans. Instead, the application relies on future

mitigation and contingency measures that will be prepared after consent, which obstructs any meaningful assessment of their sufficiency or effectiveness.

This reliance on unspecified future measures is particularly alarming 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 accidental chemical or oil spills, it does not offer sufficient details on prevention, control, or monitoring measures.

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

The lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent phase, the application inhibits the assessment of whether suitable safeguards are established to address pollution incidents. This situation introduces procedural risk and diminishes 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 contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated before granting consent; the absence of such information precludes a lawful determination. The application also fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, inadequate management plans, and uncertainty about potential impacts result in a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks and further corroborate the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application lacks a thorough evaluation of both ecological and socio-economic impacts, particularly concerning fisheries and marine life. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the proposal fails to ensure the protection and maintenance of these essential habitats and uses without significant disruption.

A critical flaw is the assumption that fishing activities can be displaced without any consequences. There is no evidence presented that alternative fishing grounds are available or capable of supporting additional pressure, which is a significant oversight.

This gap in evidence raises serious concerns about the potential for overfishing in other areas and the economic implications this could have for the local fishing fleet. The absence of a clear, evidence-based assessment means that the impacts on fisheries and the livelihoods that depend on them remain poorly understood.

Moreover, the proposal poses significant risks to marine species, especially due to the underwater noise created during construction. The high-energy hammer piling expected to occur over an extended period is likely to disturb marine life across vast distances, including species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population is alarming, yet the application minimizes these significant effects without adequate supporting evidence.

Inconsistencies within the application further undermine its credibility, particularly when it acknowledges the need for licenses to permit harm to European Protected Species while concurrently describing the impacts as negligible. This contradiction raises doubts about compliance with the Habitats Regulations, especially given that harm is expected to a level that requires legal authorization.

The assessment also neglects to consider cumulative impacts from various pressures such as habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive analysis of these combined effects, it is impossible to ascertain 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 show that development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, making it impossible to conclude that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is materially incomplete, failing to account for the full extent of impacts stemming from this single integrated project. The intrinsic link between the offshore turbines and the onshore works is overlooked, leading to a fragmented analysis that obscures the true scale of environmental and socio-economic effects.

Onshore elements encompass cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, thus

preventing a complete understanding of the project's overall environmental footprint.

The failure to address or defer the assessment of onshore impacts impedes a proper evaluation of cumulative effects. According to the Environmental Impact Assessment process, all components of a project must be considered collectively; however, the separation of offshore and onshore elements results in a lack of clarity regarding their combined impacts on peatlands, habitats, and communities.

Sensitive habitats, including machair systems and peatland environments that are under policy protection, face significant risks. The application does not provide evidence that impacts on these habitats have been fully assessed or that appropriate avoidance measures have been implemented, highlighting a clear evidential gap concerning biodiversity protection.

Concerns regarding carbon balance also arise from the proposal. Disturbance of peatland leads to the release of stored carbon, which may create a carbon debt that contradicts the goals of renewable energy development. The application falls short of adequately addressing this issue or demonstrating that the overall carbon balance remains beneficial.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal lacks a comprehensive evaluation of dark skies and nocturnal wildlife, resulting in a significant omission within the Environmental Impact Assessment. The West Lewis coastline is known for its remarkably dark skies, which are vital to the area's environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting, visible from great distances, would create a continuous "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

There is no analysis of how this lighting may impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the significance of dark skies to the region's identity and the potential for

emerging sectors like astro-tourism. The failure to account for these impacts results in a clear gap in the overall landscape and environmental assessment.

Moreover, the application neglects to evaluate the potential consequences for nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting due to their phototactic response, which can cause disorientation and increase collision risks. The absence of any lighting impact assessment or phototaxis study means that there has been no evaluation of how the proposed aviation lighting may affect these species or elevate mortality rates.

This issue is exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activity and related risks. Kittiwakes, for instance, may forage or migrate at night and are also at risk of disorientation from artificial lighting, a risk that has gone unassessed. The lack of site-specific night-time data creates a serious shortfall in understanding the ecological impacts of the proposal.

Without an assessment of nocturnal impacts, it remains 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 met, which invokes the precautionary principle and hinders a lawful determination.

From a policy standpoint, the omission contravenes National Planning Framework 4 concerning the protection of natural places and environmental quality. Furthermore, it undermines the overall assessment of landscape and seascape impacts, as the character of the night-time environment is a crucial aspect of the ecosystem.

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

TOURISM

The assessment of tourism impacts is significantly lacking, failing to address the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide any quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

Tourism on the Isle has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, thus supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nevertheless, the application neglects to model the potential

impacts of seascape industrialisation and environmental quality degradation on Tourism Gross Value Added or the wider economic resilience of the area. Without this analysis, it is impossible to ascertain whether the development would yield a net economic benefit or jeopardise an established and burgeoning sector.

Moreover, the assessment overlooks the critical role of environmental quality in promoting tourism, particularly the significance of unspoiled landscapes and dark skies to the visitor experience, as well as to emerging markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this deficiency, resulting in a considerable gap in understanding the implications for a recognised and growing segment of the local economy.

Given the context of an island community that has limited economic diversification, the lack of an assessment of tourism impacts carries broader consequences for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated as mandated under the Islands (Scotland) Act 2018.

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

In summary, the inability to quantify tourism impacts, evaluate the environmental drivers of visitor behaviour, and recognise the island's economic dependency culminates in a significant evidential gap. This inadequacy hinders a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the necessary requirements for sustainable development as defined by statutory duties and national policy. This application brings forth the same core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. It is presented under a policy framework that places greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing, yet still falls short.

There are significant deficiencies in the evidential basis for this application. The information provided does not cover critical baseline data adequately, relies on an undefined design envelope, and includes unspecified mitigation measures. Furthermore, it omits crucial impact pathways, particularly those affecting nocturnal wildlife, onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely

significant effects or any residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment contravenes statutory obligations outlined in the Islands (Scotland) Act 2018, and the failure to present the full Social Impact Assessment constitutes a serious omission. These lapses hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

The proposal is at odds with National Planning Framework 4, as it does not safeguard biodiversity, natural areas, or cultural heritage. It fails to demonstrate acceptable health and wellbeing impacts and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. Additionally, the cumulative effects of both offshore and onshore components have not been sufficiently assessed, leaving obscured impacts on peatlands, carbon balance, habitats, and crofting land.

There remains uncertainty regarding environmental risks, which could be significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in places. The evidential threshold required to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and obstructing any lawful conclusion regarding acceptable 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, and the disruption of cultural and visual relationships, along with negative impacts on tourism, result in permanent effects that cannot be adequately mitigated.

In light of these substantial information deficiencies, policy conflicts, and unresolved environmental risks, the application is fundamentally unfit for determination. The competent authority must either deny consent based on these grounds or activate the relevant regulatory provisions to require the submission of the missing information.

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

Additional Comments

My objections are based on the following:
1. Impact on marine life.
2. Impact on the environment.
3. No benefit to the community.
4. No reduction in energy costs.to local people.
4. No improvement or investment to island infrastructure.
5. A lack of engagement from Northland and local parties with the community.
6. The island will forever be altered with no recourse.

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: 96ED0029

Member of the public 655

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection stems from an analysis of the Environmental Impact Assessment Report and associated documents, which reveal significant deficiencies in planning, environmental considerations, cultural respect, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns arise regarding the scale, proximity, and design of the project, specifically questioning its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential foundation for a lawful determination. There are notable gaps in critical environmental data, and the baseline information provided is both limited and inconsistent. Additionally, several key aspects of the proposal remain undefined. The reliance on a flexible design framework hinders a clear understanding of the likely significant effects, while the unspecified mitigation measures make it impossible to assess their effectiveness. Consequently, the documentation fails to deliver a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not supported by adequate evidence.

Furthermore, there are pronounced policy conflicts associated with the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests needed for consent and compromise the competent authority's ability to ascertain that the development is acceptable from a policy standpoint.

The unprecedented scale of the proposal in this area raises serious concerns about landscape capacity, visual dominance, and environmental impact, given the large turbines planned to be positioned close to the shoreline. The cumulative effect of insufficient information, reliance on undefined mitigation, evidential deficiencies, and clear non-compliance with policy illustrates that the application is incomplete and cannot facilitate a lawful determination. Under these circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species is critically inadequate, failing to provide a comprehensive and trustworthy understanding of the ecological receptors present within the West Lewis coastal environment. This region is characterised by a delicate and biologically vibrant marine system, yet the baseline data remains

insufficient. The methodologies employed do not adequately account for species presence, behaviour, and habitat utilisation. Consequently, the assessment does not offer a solid evidential foundation for assessing impacts.

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development lacks reliability due to significant gaps in evidence and internal inconsistencies that undermine its conclusions. The application fails to demonstrate, to the necessary evidential standard, that internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline, will not be adversely affected. Located within key foraging areas and migratory pathways, the development risks displacement, collision, and habitat loss,

yet these implications are not robustly evaluated.

A critical inconsistency arises within the application itself, where the developer asserts no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation, which is applicable only when significant harm is anticipated. This contradiction casts doubt on the assessment's reliability and raises questions about the support provided by the underlying evidence. Furthermore, the assessment fails to adequately demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not thoroughly considered, and the reliance on modelling approaches leads to uncertainty, particularly concerning species like Kittiwakes and Fulmars that are in severe decline. The methodologies employed likely underestimate mortality, especially given incomplete baseline data and an insufficient understanding of behavioural responses.

Siting turbines within a recognised migratory corridor introduces further risk by creating a barrier in a primary flight path used by species travelling between the United Kingdom and Iceland. The application does not adequately consider the long-term implications of sustained mortality in this corridor or the potential impacts on species with relatively small global populations. From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This necessitates the application of the precautionary principle, precluding a lawful conclusion in support of consent.

These deficiencies indicate 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 affected places the proposal directly at odds with national policy. Collectively, the assessment’s internal inconsistencies, methodological weaknesses, and lack of sufficient evidence prevent a thorough evaluation of impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposal is significantly lacking in transparency and therefore cannot meet lawful evaluation standards. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report remains unpublished. This omission creates a substantial evidential gap, hindering both public understanding and that of the competent authority regarding the social risks outlined in the developer's own research.

Residents are reportedly facing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposed development. These findings arise from

direct engagement and are firmly grounded in evidence. Nonetheless, the failure to release the complete assessment restricts thorough scrutiny of its findings, which limits the ability to evaluate their significance in the decision-making process.

Furthermore, the proposal is viewed by many as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite these serious implications, they have not been adequately integrated into the main application or assigned appropriate weight. The non-disclosure of the full Social Impact Assessment thus conceals the true human and social costs involved in the development.

This lack of transparency critically undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is vital for developments of this magnitude, particularly where community character and functioning may be compromised. The application, by failing to provide the complete dataset, does not present a thorough evidential foundation needed for assessing the balance between potential benefits and harms.

In terms of policy compliance, the application falls short of demonstrating alignment with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes while avoiding detrimental effects, yet available evidence points to existing adverse impacts that have not been fully disclosed. Without the complete assessment, the claim of compliance with this policy remains unsubstantiated.

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 represents a material omission within the application and constitutes a failure to meet the evidential standards set by the Environmental Impact Assessment regime.

When considered collectively, the non-disclosure of the full Social Impact Assessment alongside the evidence of existing adverse impacts results in an incomplete and unreliable assessment. This lack of information precludes a lawful determination and supports the conclusion that the application lacks sufficient data.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual and landscape impacts associated with the proposed turbines is significantly inadequate, failing to accurately capture the scale of change and the sensitivity of the West Lewis coastline. This area is characterised by its unspoilt Atlantic horizon, natural landscape, and a profound sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would introduce a pervasive industrial presence that would fundamentally change this character, leading to an irreversible transformation of the landscape.

The application does not effectively represent the extent of the visual changes

anticipated. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and undermining the defining qualities of naturalness and remoteness. The assessment inadequately conveys the significance of these impacts in the context of such a sensitive landscape.

Moreover, there are serious methodological issues concerning the selection and presentation of visual viewpoints. It appears that the chosen viewpoints do not adequately represent the most sensitive receptors or the worst-case scenarios, particularly regarding cultural heritage sites and high-value landscapes. This raises concerns that the magnitude of visual impact has been understated, thereby compromising the assessment's reliability.

Another critical oversight is the lack of consideration for the interconnectedness of landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are integral to a wider landscape that is visually and spatially linked to the Atlantic horizon. The assessment treats these heritage assets in isolation, disregarding their interdependence, which results in a partial evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever these important relationships, altering how heritage assets are perceived and disrupting their connection to the natural horizon. This not only represents a visual issue but also inflicts broader cultural and spatial damage, which has not been sufficiently evaluated in the application.

From a policy standpoint, this proposal contravenes the National Planning Framework 4, particularly regarding the protection of natural landscapes and historic assets. The extent of the proposed changes is inconsistent with the requirement to preserve landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a thorough worst-case assessment further diminishes any claims of compliance with policy guidelines.

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

In summary, the assessment fails to accurately portray the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and strongly indicate that the proposal is incompatible with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is deficient, lacking the necessary detail to evaluate potential environmental impacts adequately. The proposal entails significant seabed preparation and installation activities within the dynamic Atlantic environment, yet it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be formulated after consent, which hampers any meaningful assessment of their sufficiency or effectiveness.

This dependency on unspecified future measures raises particular alarm given the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disruption and contamination. Although the application recognises risks such as sediment mobilisation and the possibility of chemical or oil spills, it fails to detail how these incidents will be prevented, managed, or monitored.

There remains uncertainty regarding the scale and dynamics of sediment plumes that could result from seabed disruption and cable installation. In the absence of comprehensive modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also pertains to the potential effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether adequate measures are established to respond to pollution incidents. This creates procedural risks and diminishes the ability of the competent authority to properly assess environmental protection measures at the determination stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements established by the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures be evaluated prior to consent, and the absence of such information renders a lawful determination impossible. The application also does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

Overall, the failure to provide defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts lead to an assessment that is materially inadequate. These deficiencies inhibit a thorough evaluation of construction and pollution risks and further substantiate the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application in question does not sufficiently evaluate the ecological or socio-economic impacts associated with these

vital resources. It fails to convincingly demonstrate that existing habitats and fishing activities can be protected or maintained without facing significant disruption.

A critical flaw within the application is its assumption that fishing activities can be displaced without any adverse consequences. There is no evidence provided that alternative fishing grounds are available or that they can handle the additional pressure resulting from such displacement. This lack of information is particularly concerning, as it risks overfishing in other areas and could have broader economic repercussions for the local fishing fleet. The absence of a detailed and evidence-based assessment inhibits a proper understanding of the potential impacts on both fisheries and local livelihoods.

Moreover, the proposal poses considerable risks to marine species due to the underwater noise generated during construction. The anticipated high-energy hammer piling over an extended duration is expected to disturb marine life over vast areas, notably affecting species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application seems to downplay these effects without adequate supporting evidence.

There are also inconsistencies within the application itself, particularly regarding the necessity for licences to allow harm to European Protected Species while simultaneously claiming that the impacts are negligible. This contradiction undermines the credibility of the assessment and raises questions about adherence to the Habitats Regulations, especially in scenarios where harm is predicted to a degree necessitating legal authorisation.

Additionally, the assessment neglects to consider the cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A lack of thorough evaluation of these combined effects means that the overall impact on marine ecosystems and socio-economic conditions cannot be determined effectively.

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

In summary, the deficiencies related to evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment collectively render it incomplete and unreliable. This results in an inability to conduct a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is significantly incomplete, failing to acknowledge the full extent of the impacts from what constitutes a single integrated

project. The offshore turbines and onshore works are fundamentally interconnected, yet they are evaluated separately. This fragmented approach obscures the true scale of the environmental and socio-economic effects associated with the project.

Onshore elements include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of related access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, which is recognised as a critical carbon store and ecologically sensitive habitat. The application does not provide a thorough assessment of these impacts, thereby hindering a complete understanding of the project's overall environmental footprint.

By not assessing onshore impacts, the application obstructs the ability to evaluate cumulative effects adequately. The Environmental Impact Assessment process mandates that all components of a project be considered in tandem. However, the distinct separation of offshore and onshore elements results in an incomplete understanding of their combined impacts on peatlands, habitats, and local communities.

Moreover, there are considerable risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not sufficiently demonstrate that the impacts on these habitats have been fully evaluated or that appropriate avoidance measures have been established. This leaves a notable evidential gap concerning biodiversity protection.

Concerns also arise regarding the project's carbon balance. Disturbance of peatland releases stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application fails to adequately address this issue or to show that the overall carbon balance remains favourable.

Additionally, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is insufficient evidence in the application to confirm that the necessary consents or processes have been initiated, raising significant questions about the project's deliverability and lawful execution.

From a policy perspective, the lack of a holistic assessment of the project and the failure to demonstrate adequate protection of peatlands, habitats, and land use interests conflict with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further undermines the application.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application echoes the main issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Now, despite being assessed under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the proposal remains flawed.

The evidential basis for the application is neither complete nor reliable. Key baseline data is missing, the design envelope is not clearly defined, and unspecified mitigation measures are relied upon. Additionally, essential impact pathways have been overlooked, including those related to nocturnal wildlife, onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is insufficient and fails to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedurally, the application presents serious shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the incomplete Social Impact Assessment is a significant omission. These gaps hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

In terms of compliance with National Planning Framework 4, the proposal is in direct conflict. It does not adequately protect biodiversity, natural places, or cultural heritage. It fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to missing tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, leaving the impacts on peatlands, carbon balance, habitats, and crofting land unclear.

Uncertainty surrounds potential environmental risks, which could be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and often inconsistent. The necessary evidential threshold to rule out 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.

The proposal threatens to cause substantial and irreversible changes to a sensitive landscape. Industrialisation along the Atlantic-facing coastline, the loss of dark skies, disruption to cultural and visual connections, and negative impacts on tourism create permanent effects that cannot be mitigated satisfactorily.

In summary, the application is both procedurally and substantively unfit for determination. The extent of information gaps, coupled with policy contradictions and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority should either refuse consent based on these grounds or use appropriate regulatory measures to require the submission of the missing information.

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

Additional Comments

This project shows that there is apparently no intentions by the developer/contractor/Scottish Government to safeguard all that will be considered in the vrious topics of this objection.
Ther crux of the msatter is rather simple: The shareholders of the owners of this windpark will be the only ones enjoying the fruits of their investments whilst the local population in the entire affected area of the Hebridean islands will be screwed from here to eternity and will habe no financial income from the construction.

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: BDA307BC

Member of the public 656

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 for marine licensing and Environmental Impact Assessment considerations. A thorough review of the Environmental Impact Assessment Report and accompanying documents reveals serious deficiencies in planning, environmental, cultural, and procedural aspects. Located off the west coast of the Isle of Lewis, this region is characterised by its Atlantic-facing coastline, relatively untouched environment, and strong cultural significance. The proposal's scale, design, and proximity to the shore raise profound concerns regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential foundation necessary for a lawful decision. Essential environmental data is absent, baseline information is inconsistent and limited, and numerous critical elements of the proposal remain unspecified. Furthermore, the reliance on a flexible design framework hinders a clear assessment of potential significant effects, while the unspecified mitigation measures mean their effectiveness cannot be judged. Consequently, the documentation fails to offer a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by credible evidence.

Additionally, there are significant conflicts with existing policies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and public health. It does not adequately show that national standards for protecting biodiversity, climate interests, and environmental integrity can be upheld. These conflicts directly challenge the statutory tests for consent and weaken the competent authority's ability to determine the development's acceptability in policy terms.

The unprecedented scale of the proposed development, with large turbines situated close to the coastline, raises urgent concerns about landscape capacity, visual impact, and environmental repercussions. The combination of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy violations indicates that the application is incomplete and incapable of sustaining a lawful decision. In light of these issues, the precautionary principle should be applied.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of health, social impacts, and wellbeing surrounding this application is fundamentally flawed and lacks the necessary transparency for a lawful evaluation.

Although the developer has commissioned a Social Impact Assessment that included focus groups with local residents, the comprehensive report has yet to be made public. This creates a substantial evidential gap, hindering both the public and the relevant authority from fully grasping the social risks identified in the developer's own research.

Available summaries reveal that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These documented impacts arise from direct community engagement and are not merely speculative. Nonetheless, the absence of the complete assessment inhibits thorough scrutiny of its findings, limiting the capacity to ascertain their significance within the decision-making framework.

Furthermore, there is evidence suggesting that the proposal poses a tangible threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this recognition, such impacts have not been adequately incorporated into the main application or given the appropriate consideration they warrant. The failure to disclose the full Social Impact Assessment therefore obscures the genuine human and social costs associated with this development.

This lack of transparency further undermines the Environmental Impact Assessment process. An all-encompassing understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when considering potential effects on community character and functionality. By not providing the full dataset, the application lacks a comprehensive evidential foundation for evaluating the balance of benefits against potential harms.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm; however, the available evidence points to existing adverse effects that remain undisclosed. Without access to the complete assessment, compliance with this policy cannot be established.

The procedural ramifications are considerable. The relevant authority cannot perform a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This omission constitutes a material deficiency within the application and represents a failure to satisfy the evidential requirements mandated by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, in conjunction with documented existing adverse effects, renders the assessment inadequate and unreliable. This ultimately hampers a lawful determination and reinforces the conclusion that the application lacks sufficient information for proper consideration.

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

Having been tourists to the Outer Hebrides for our honeymoon, and subsequent holidays, we love the islands and have friends living there. Windmills as they have been termed, out in the sea would be an eyesore. I hate the things. Noisy, kill birds and look terrible.

The impact on fishing would be so detrimental. We spoke to a fisherman the year before last who told us that they'd had a terrible season and not made any money. You would destroy people's way of life that has been going on for hundreds of years. Shame on you.

There is nothing 'green' about wind turbines. They are fit for scrap in a few years and of course made in China where there is little respect for humanity.

How many islanders want them?

Try drilling for oil in the N Sea instead.

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: 8F8E300B

Member of the public 657

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and fails to provide a complete, transparent, or trustworthy assessment of the potential environmental impacts of the proposal. The reliance on a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This lack of specificity undermines the integrity of the assessment, resulting in a scenario where the impacts discussed may not accurately represent the development that will be constructed. Consequently, both the public and the competent authority are left without a true understanding of the environmental effects involved.

Furthermore, the application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the premise that environmental harm will be addressed later hinders any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. This postponement of critical information to stages following consent is procedurally unacceptable and contradicts the fundamental purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before any determination.

Significant evidential deficiencies also exist, including gaps in baseline data, limitations in methodology, and an overreliance on assumptions rather than site-specific evidence. These shortcomings lead to uncertainty regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are presented without robust supporting data. The lack of adequate information inhibits a clear understanding of cumulative and worst-case impacts, generating scientific uncertainty that fails to meet statutory requirements.

As a result, the application does not fulfil the evidential threshold necessary under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been fully evaluated or that appropriate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application fails to provide a comprehensive evaluation of alternatives, which is crucial under the Environmental Impact Assessment regime. Instead of a systematic, evidence-based comparison of realistic alternatives that considers environmental effects, it offers a narrative on the project's evolution. This lack of structure fails to

show that less harmful options have been adequately identified, assessed, and chosen over more damaging solutions.

Moreover, the application does not transparently compare alternative offshore locations, development scales, or design configurations. Specifically, it does not prove that the developer has earnestly contemplated placing turbines further offshore, where impacts on visual aesthetics, ecology, and coastal environments might be less severe. Given the sensitivity of the West Lewis coastline and the significance of proximity to shore in evaluating impacts, the absence of such analysis means one cannot conclude that the proposed siting is the least damaging option available.

The shortcomings also pertain to cable routing and landfall assessments, where there is a lack of evidence showing that alternative routes have been thoroughly examined to avoid or lessen impacts on sensitive areas. 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 imply that mitigation by design has not been sufficiently implemented, relying instead on measures to mitigate effects after the design phase.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout decisions, and infrastructure routing. This oversight represents a failure to adhere to the established mitigation hierarchy and obstructs the competent authority from determining whether more appropriate and less harmful alternatives might exist. Without a thorough assessment of alternatives, it cannot be asserted that the proposal aligns with sustainable development or relevant policy criteria.

From a policy standpoint, this deficiency jeopardises compliance with National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant shortfall that ultimately leads to the conclusion that the application has not been adequately evaluated and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species surrounding the West Lewis coastal environment is fundamentally inadequate. It fails to offer a thorough and reliable insight into the ecological receptors present in this sensitive marine ecosystem. The data collected is incomplete, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment does not provide a solid evidential basis for understanding the potential impacts of the proposed activities.

One major shortcoming is the lack of proper recognition and assessment regarding otters, a species protected under European law. The application does not adequately account for their active use of coastal areas for foraging and movement, which is

critical for understanding the potential impacts of construction disturbance, noise, and increased human activity. This oversight significantly undermines any assertions made about the absence of significant effects on otters.

Moreover, the assessment of basking sharks is notably flawed due to an over-reliance on aerial surveys, which introduce considerable detection bias, especially under Atlantic conditions. This method is likely to underrepresent the presence of basking sharks in these waters, particularly when compared to more reliable land-based observations that indicate their frequent usage of the area. The failure to include or appropriately consider such data further compromises the completeness of the baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings mean that assertions regarding negligible or non-significant effects are based more on assumptions than on substantial evidence. Additionally, the lack of adequate baseline data hampers any meaningful evaluation of cumulative and indirect impacts, including seasonal fluctuations and broader ecosystem interactions. This uncertainty clouds the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements set out by the Environmental Impact Assessment regime or the National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced by these deficiencies means that adverse effects cannot be ruled out beyond reasonable scientific doubt, invoking the precautionary principle. In light of these factors, granting consent is not legally justifiable.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment untrustworthy. These issues impede a thorough evaluation of impacts on marine ecology and protected species, ultimately highlighting the lack of a robust evidential foundation for the application.

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to demonstrate that internationally important seabird populations will not be adversely affected, which places the proposal in direct conflict with national policy. Significant gaps in evidence and internal inconsistencies undermine the conclusions of the ornithological assessment, which is materially flawed. The west coast of the Isle of Lewis, known for its internationally significant seabird populations, faces potential threats as many species are already in decline. Furthermore, the development is situated within key foraging areas and migratory pathways, yet the assessment does not adequately evaluate the implications of displacement, collision risk, or habitat loss.

A fundamental contradiction arises in the application, as the developer claims no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only necessitated when significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment, suggesting that

the conclusions drawn are not substantiated by the underlying evidence. The evaluation fails to sufficiently address the potential impact on seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds has not been fully accounted for, and reliance on modelling introduces uncertainty, particularly for species in severe decline, including Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

The siting of turbines within a recognised migratory corridor creates an additional risk by effectively forming a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not thoroughly assess the long-term implications of sustained mortality within this corridor or the potential effects on species with relatively small global populations. From a regulatory perspective, the evidential threshold required to determine no adverse effect on the integrity of protected sites has not been met. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle and impedes a lawful conclusion in support of consent.

Overall, the deficiencies identified reflect a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. Taken collectively, the shortcomings render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence, ultimately preventing a robust evaluation of impacts and indicating that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the proposed development's impact on cultural heritage and community identity is fundamentally flawed. It fails to recognise the West Lewis coastline as a dynamic cultural landscape, in which environment, language, tradition, and community are intertwined. The application adopts a simplistic view of heritage, treating it as a collection of separate, unchanging assets, rather than appreciating their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual activities; however, the assessment regards them merely as static features. This oversight neglects their continued use and the potential impacts of development on their settings, leading to an incomplete understanding of the cultural ramifications and disregarding their importance in community life.

Moreover, the application neglects to evaluate intangible cultural heritage, such as the Gaelic language, local traditions, and the established relationship between the community and the coastal environment. These aspects are essential to the area's identity but are conspicuously missing from the assessment, which is a substantial

shortfall. Without the inclusion of these elements, the cultural implications of the development cannot be accurately assessed.

Concerns also arise regarding the rights of the community and the level of engagement involved. The Gaelic-speaking population, possessing a distinct cultural identity akin to that of an Indigenous People, has not been afforded the necessary process of Free, Prior and Informed Consent. The lack of meaningful engagement undermines the credibility of the assessment and falls short of recognised standards for participation in decisions that affect cultural and environmental interests.

A significant procedural deficiency is the absence of an Island Communities Impact Assessment, a requirement mandated by the Islands (Scotland) Act 2018. The omission of this assessment inhibits the competent authority from fulfilling its legal responsibilities to assess the social, cultural, and economic impacts on the island community. This alone renders any determination regarding the application legally insufficient.

From a policy standpoint, these inadequacies place the proposal at odds with National Planning Framework 4, especially concerning the preservation of historic assets and locations. The neglect to account for both tangible and intangible heritage, along with the failure to acknowledge ongoing cultural practices, signifies a substantial divergence from established policy obligations.

In summary, the shortcomings in assessing living heritage, intangible cultural value, community rights, and adherence to statutory requirements create a considerable evidential void. The cultural effects of the development remain inadequately evaluated, and the application does not present a robust foundation for understanding the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises significant concerns regarding social impacts, health, and wellbeing, as the assessment currently lacks the necessary transparency for a lawful evaluation. Although a Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, the full report remains unpublished. This lack of access creates an important evidential gap, inhibiting both public understanding and the competent authority's ability to assess the identified social risks based on the developer's own research.

Local residents have reported measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are therefore concrete rather than speculative. However, the omission of the full assessment hampers proper scrutiny of the findings and limits the determination of their significance in the decision-making process.

Moreover, the proposal is viewed as a potential threat to community identity and cohesion, with the concept of “cultural loss” highlighted in the developer's findings.

Despite this acknowledgment, the impacts related to community cohesion have not been adequately incorporated into the main application or given the appropriate consideration. 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 they may affect community character and functioning. By failing to provide the complete dataset, the application does not offer a solid evidential foundation for weighing benefits against harms.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. It is essential for developments to promote positive health outcomes and mitigate harm, yet the available evidence reveals existing adverse effects that have not been fully addressed. Without the complete assessment, it is impossible to prove compliance with this policy.

The procedural implications of this situation are considerable. The competent authority cannot perform a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This omission constitutes a significant gap in the application and does not meet the evidential requirements established by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, landscape, and seascape impacts is inadequate, failing to accurately represent the degree of change and 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 large-scale turbines, situated near the shoreline, would establish a continuous industrial presence that fundamentally alters this character, leading to a permanent and irreversible transformation of the landscape.

Moreover, the application does not sufficiently illustrate 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, adversely affecting visual amenity and diminishing the qualities that define naturalness and remoteness. The assessment does not effectively communicate the level of impact or its significance within the context of this sensitive landscape.

There are significant methodological issues 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. This oversight raises the possibility that the visual impacts have been understated, thereby compromising the reliability of the assessment.

Additionally, the assessment neglects to examine the interconnectedness of landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape context linked visually and spatially to the Atlantic horizon. Treating these sites as isolated entities disregards their interdependence and results in an incomplete evaluation of the impacts on their settings and cultural significance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 concerning the protection of natural spaces and historic assets. The scale of proposed changes is incompatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case scenario assessment further weakens any assertion of policy compliance.

It is evident that the impacts outlined cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and inescapable. Consequently, the resulting changes would be fundamental and permanent, rather than reducible to an acceptable level through mitigation efforts.

In conclusion, the assessment fails to accurately convey the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a dependable evaluation and reinforce the notion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is known for its clean coastal waters and important habitats, which are particularly vulnerable to contamination and sediment disturbance. The proposal includes significant seabed preparation and installation activities within a high-energy Atlantic environment; however, the assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate the likely environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans in place. Instead, the application depends on mitigation and contingency measures that are to be prepared after consent, hindering any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises significant concerns given the sensitivity of the surrounding environment. While the application does acknowledge risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide enough detail on how these risks will be prevented, controlled, or monitored. Additionally, there is uncertainty surrounding the scale and behaviour of sediment plumes that may arise from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also extends to potential consequences for marine species and habitats that have already been identified as sensitive.

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

From a regulatory standpoint, deferring critical environmental safeguards is at odds with the requirements set forth by the Environmental Impact Assessment regime. Likely significant effects and necessary mitigation must be evaluated prior to consent, and the absence of such information prevents a lawful determination. The application also does not adequately demonstrate compliance with the policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

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

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is significantly lacking, failing to take into account the full extent of impacts associated with what is essentially a singular integrated project. The interconnection between offshore turbines and onshore works necessitates a unified assessment; however, they are evaluated separately. This fragmented approach obscures the true scale of environmental and socio-economic effects.

Onshore components involve the installation of cabling across protected moorland and the construction of a substation near Stornoway, along with access infrastructure traversing sensitive landscapes. Notably, these works include excavation in areas of deep peat, particularly within Barvas Moor, a crucial carbon store and ecologically sensitive habitat. The application does not adequately assess these impacts, hindering a complete understanding of the project's overall environmental footprint.

By neglecting to assess onshore impacts comprehensively, the application fails to enable a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively; the disjointed assessment of offshore and onshore elements prevents a full understanding of the combined impacts on peatlands, habitats, and local communities.

There are also considerable risks posed to sensitive habitats, including machair systems and peatland environments, which hold policy protection. The application does not show that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, revealing a clear evidential gap concerning biodiversity protection.

Moreover, the proposal raises issues related to carbon balance. Disturbance of peatland can release stored carbon, potentially resulting in a carbon debt that runs counter to the aims of renewable energy development. The application fails to address this concern adequately or show that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land raises the possibility of conflicts with existing land use and legal rights. The application does not provide evidence that the required consents or processes have been initiated, leading to uncertainties regarding deliverability and lawful implementation.

From a policy standpoint, the failure to assess the entire project cohesively and demonstrate protection for peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The lack of ability to demonstrate that impacts can be avoided or mitigated further undermines the application.

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

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 requirements for sustainable development as outlined in statutory duties, national policy, and evidential standards. It raises the same fundamental issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This application is now presented within a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis for decision-making is neither complete nor reliable. There are significant gaps in baseline data, the design envelope remains undefined, and it relies on unspecified mitigation measures. Furthermore, key impact pathways have been omitted, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment lacks the completeness needed to fully understand the likely significant effects or any residual impacts.

There are also serious procedural shortcomings. The failure to provide a compliant Island Communities Impact Assessment breaches statutory requirements under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of a complete Social Impact Assessment is a material omission. These issues hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In direct conflict with National Planning Framework 4, the proposal does not adequately protect biodiversity, natural places, and cultural heritage. It fails to demonstrate that the health and wellbeing impacts are acceptable and does not provide evidence of a net economic benefit, as there is no tourism impact modelling included. The cumulative effects of both offshore and onshore elements have not been properly assessed, masking potential impacts on peatlands, carbon balance, habitats, and crofting land.

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

The proposed project would lead to substantial 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 negatively impact tourism, leading to permanent effects that cannot be adequately mitigated.

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

Therefore, it is formally requested that the application for the Spiorad na Mara Offshore Wind Farm is completely refused.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 56A8167B

Member of the public 658

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

Dear Sir/Madam

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's approach to assessing social impacts, health, and wellbeing is inadequate and lacks necessary transparency. Although a Social Impact Assessment was commissioned, which included focus groups with local residents, the complete report remains unpublished. This creates a notable gap in evidence and restricts both public insight and the competent authority's understanding of the social risks identified by the developer's own research.

Residents are reportedly experiencing increased levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These effects arise from direct community engagement and are not based on speculation. However, without access to the full assessment, proper scrutiny of these findings is impossible, limiting the ability to evaluate their significance in the decision-making process.

Moreover, the proposal is viewed as a potential threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this recognition, such impacts have not been adequately reflected in the main application or given sufficient consideration. The lack of a complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This absence of transparency is detrimental to the Environmental Impact Assessment process. Understanding the full range of social, economic, and health impacts is critical for developments of this magnitude, especially when the character and functioning of the community may be at stake. By failing to provide the complete data set, the application does not offer a comprehensive evidential basis to weigh benefits against harm.

From a policy standpoint, the application does not align with National Planning Framework 4 regarding health and wellbeing. Development is expected to promote positive health outcomes and mitigate harm, yet the evidence at hand indicates significant adverse effects that have not been fully disclosed. Without the complete assessment, it is not possible to establish compliance with this policy.

The implications of these procedural shortcomings 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 omission constitutes a significant flaw in the application and a failure to meet the evidential standards required by the Environmental Impact Assessment framework.

Overall, the failure to disclose the complete Social Impact Assessment, along with evidence of current negative impacts, renders the assessment both incomplete and unreliable. This situation hinders a lawful determination and reinforces the assertion that the application is not backed by sufficient information.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the criteria for sustainable development as required by statutory duties,

national policy, and evidential standards. It mirrors the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This new application, presented under a supposedly stronger policy framework, has not adequately addressed the essential considerations of biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical deficiencies exist in the evidential basis for the proposal. There are notable gaps in baseline data, a reliance on an undefined design envelope, unspecified mitigation measures, and significant omissions in key impact pathways related to nocturnal wildlife, the entirety of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, preventing a comprehensive understanding of potential significant effects or residual impacts.

Additionally, the application exhibits procedural shortcomings. The lack of a compliant Island Communities Impact Assessment is a violation of statutory duty under the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment is a serious omission. These inadequacies hinder the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Conflicts with National Planning Framework 4 are evident. The proposal fails to demonstrate adequate protection for biodiversity, natural environments, and cultural heritage, and does not satisfactorily address health and wellbeing impacts or provide evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been appropriately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks are significant and potentially severe. Assessments concerning marine ecology, seabirds, protected species, and marine mammals lack completeness and are inconsistent in parts. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In conclusion, the application is both procedurally and substantively unfit for determination. The combination of information deficiencies, policy contradictions, and unresolved environmental risks obstructs a lawful and evidence-based decision. The competent authority is urged to either refuse consent on these grounds or utilise the appropriate regulatory measures to compel the submission of the necessary missing information.

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

Additional Comments

The height, power rating and closeness to shore of the propose Spiorad na Mara wind power plant poses considerable risk to the health and wellbeing of communities living along the western coastline of the island of Lewis.

The scoping out of subaudible turbine noise from the turbine noise regulation, ETSU-R-97 results in adverse impacts to the human health and wellbeing of people living adjacent to wind power plants.

Turunen Et al. (2021) found that;

The model for building and individual characteristics showed that living within 2.5 km from the closest wind turbine, having two or more chronic diseases, having impaired hearing and being sensitive to noise were statistically significantly associated with increased probability of having wind turbine infrasound related symptoms.

[Page 5 of 'Symptoms intuitively associated with wind turbine infrasound' Turunen Et al., Environmental Research, 192, 2021. (https://www.sciencedirect.com/science/article/pii/S0013935120312573)]

The potential for subaudible turbine noise to disproportionately impact the health and wellbeing of disabled people raises the question of discrimination. By scoping out subaudible turbine noise, ETSU-R-97 would appear to be in conflict with the Equality Act, 2010.

The Scottish Planning Policy, which is replaced by NPF4, recommended 2 km separation distance of turbines with the edges of towns, cities and villages in areas of significant protection in Scotland (page 39). This 2 km separation distance recommendation was made to reduce visual impact. No separation distance recommendation was made to protect human health and wellbeing from subaudible turbine acoustic pollution.

NPF4 has dropped the 2 km separation distance recommendation for visual impact. In Policy 11, The NPF4 states that;

"potential impacts on communities, nature and other receptors will be important considerations in the decision-making process. Additionally, the policy requires that project design and mitigation demonstrate how impacts on communities and individual dwellings, including residential amenity, visual impact, noise and shadow flicker and cumulative impacts will be addressed. All applications are subject to site-specific assessments."

Until such time that ETSU-R-97 is replaced by BS4142 and low frequency turbine noise is regulated, developers cannot demonstrate how noise impacts will be addressed as per this NPF4 policy requirement. The severity of subaudible turbine noise health impacts, and the disproportionate harm to disabled people, necessitates an immediate moratorium on consenting wind energy power plant developments in Scotland including offshore developments sited dangerously close to coastal communities.

The Ferret (https://www.theferret.scot/giant-wind-turbines-health-problems/) reports that at least 13 people were harmed by SSE's Hunterston National Offshore Turbine Test Facility between 2014 and 2018.

SSE's Hunterston site was a testing facility. SSE engineers would call impacted individuals to warn of planned testing. These individuals could then choose to leave the area to avoid serious health impacts.

Hunterston was decommissioned but Spiorad na Mara will be an operational power plant. Residents of Lewis will not be able to escape the subaudible acoustic pollution of these turbines.

In 2009, Dr Nina Pierpont recommended a setback distance of 2 to 3.5 km for turbines in mountainous terrain (see page 122 of Wind Turbine Syndrome by Dr Nina Pierpont, 2009) but this recommendation was applicable to much smaller turbines e.g. power rating of 2 MW, height less than or around 100 m.

A pilot study, conducted by the Finnish Environmental Health Organisation (see Mehtätalo Et al. 2019) indicated that turbine symptoms decreased significantly only over 15-20 km from wind power plants. The data for this study was collected in 2016. The size and power output of turbines has increased since this study was published. Infrasound sound levels increase with turbine size and power output and therefore, 'risk zones' also increase in size so the 15-20 km finding in Mehtätalo Et al. 2019 may now be an underestimation of safe setback distances.

Turbine power rating and height, topography, weather and atmospheric conditions can all influence the reach of subaudible turbine acoustic pollution. Professor Kenn Mattsson and colleagues at the University of Uppsala in Sweden have developed SoundSIM360 software which can accommodate all these variables https://rhows.com. The ground truthing of SoundSIM360 has demonstrated that subaudible blade pass frequency turbine emissions of 1 Hz can retain dangerously high sound pressure levels over several kilometres (Mattsson Et Al., Efficient finite difference modelling of infrasound propagation in realistic 3D domains: Validations with wind turbine measurements. Applied Acoustics, 243, 2026).

The turbines proposed for Spiorad na Mara will emit low frequency acoustic pollution that will directly harm the health and wellbeing of the coastal communities along the western shores of Lewis. For this reason, this proposed development should not be given consent.

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: 5262D47B

Member of the public 659

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 reveals significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environmental conditions, and strong cultural heritage. Concerns arise regarding the compatibility of the scale, proximity, and design of the proposal with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential basis for lawful determination. Important environmental data is absent, baseline information is both limited and inconsistent, and key proposal elements remain undefined. The flexible design framework employed hampers a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive or informed assessment of environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack robust evidential support.

Furthermore, the proposal presents clear and substantive conflicts with policy. It 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. The application does not adequately demonstrate adherence to national obligations to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory tests required for consent and hinder the competent authority's ability to deem the development acceptable from a policy perspective.

The unprecedented scale of this proposal poses significant concerns due to the large turbines being positioned in close proximity to the shoreline, raising issues related to landscape capacity, visual dominance, and environmental impact. In summary, the combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and evident policy non-compliance signifies that the application is incomplete and unable to 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 fundamentally flawed, lacking a complete, transparent, and dependable account of the likely environmental effects associated with the proposed development. The reliance on a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This approach undermines the reliability of the assessment and leads to the potential misrepresentation of the impacts, as it prevents both the public and the competent authority from comprehending the true extent of environmental effects.

Consent is sought on the assumption that environmental harm will be mitigated through undefined measures and management plans in the future. This reliance on yet-to-be-determined strategies obstructs any meaningful evaluation of their effectiveness and the assessment of residual impacts. Such deferral of essential information to the stages following consent is procedurally unacceptable and contravenes the objectives of the Environmental Impact Assessment regime, which demands that likely significant effects and mitigation are clearly established prior to determination.

Moreover, the application exhibits significant evidential shortcomings, such as gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These shortcomings contribute to uncertainty surrounding the scale and significance of impacts, especially when negligible or non-significant effects are suggested without adequate supporting data. The lack of sufficient information impedes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

Consequently, the application fails to satisfy the evidential threshold outlined in the Habitats Regulations, which requires the exclusion of adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it has not been shown that impacts have been fully assessed or that suitable safeguards exist.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These inadequacies obstruct a lawful and rigorous assessment of environmental effects, meaning that the competent authority cannot justifiably determine the application based on the provided information.

ASSESSMENT OF ALTERNATIVES

The application significantly fails to meet the statutory requirements of the Environmental Impact Assessment regime due to an inadequate assessment of alternatives. Instead of offering a structured comparison of viable options based on environmental effects, it provides a narrative of project evolution. This method does not sufficiently demonstrate that less harmful alternatives have been identified and evaluated in favour of more damaging options.

There is a notable absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has seriously considered positioning turbines further offshore, where potential visual, ecological, and coastal impacts could be diminished. The sensitivity of the West Lewis coastline highlights the critical importance of proximity to shore in assessing impact, and the lack of this analysis makes it impossible to conclude that the proposed siting is the least damaging available option.

The inadequacies further extend to cable routing and landfall evaluation, where there is insufficient evidence to suggest that alternative routes have been adequately explored to avoid or mitigate impacts on sensitive receptors, including culturally and spiritually significant locations like Barvas Cemetery. The failure to present a clear avoidance strategy or comparative analysis implies that mitigation by design has not been employed, relying instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through thoughtful site selection, layout decisions, and infrastructure routing. This oversight represents a breach of the established mitigation hierarchy and prevents the competent authority from assessing whether more suitable and less harmful alternatives are available. Without a thorough alternatives assessment, it is impossible to conclude that the proposal constitutes a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents a significant deficiency in the assessment of marine ecology and protected species, failing to provide a thorough understanding of the ecological receptors in the West Lewis coastal environment. This area is not only biologically active but also highly sensitive, yet the baseline data remains incomplete. Furthermore, the methodologies employed do not effectively capture the presence, behaviour, or habitat use of various species, which undermines the reliability of the assessment's conclusions regarding potential impacts.

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations that are already in decline. The ornithological assessment related to the development in this area is fundamentally flawed, exhibiting significant gaps in evidence and internal inconsistencies that compromise its conclusions. The application fails to meet the evidential standard required to demonstrate that these seabird species will not experience adverse effects. Key foraging areas and migratory pathways are not adequately evaluated within the assessment, particularly concerning the risks of displacement, collision, and habitat loss.

There exists a fundamental contradiction within the application itself. The developer asserts that there will be no significant adverse effects, yet simultaneously presents a case for Habitats Regulations derogation, which is invoked only when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence provided. Furthermore, the assessment lacks sufficient evidence regarding the potential impacts on seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda. The crucial feeding grounds for these species are inadequately

accounted for, and the reliance on modelling introduces considerable uncertainty, especially for species like Kittiwakes and Fulmars that are already experiencing severe population declines.

The siting of turbines within a recognised migratory corridor introduces a notable and additional risk, potentially obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment fails to thoroughly investigate the long-term consequences of sustained mortality within this corridor and the potential impacts on species that have relatively small global populations. From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to assert that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, combined with data deficiencies and limitations in the modelling approaches, indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This invokes the precautionary principle, thereby obstructing a lawful conclusion that would support consent.

Moreover, the deficiencies identified reflect a non-compliance with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy. Collectively, these factors render the assessment unreliable due to internal inconsistencies, methodological shortcomings, and insufficient evidence. Such deficiencies hinder a thorough evaluation of impacts, leading to the conclusion that the application fails to satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage surrounding the West Lewis coastline is profoundly lacking. This area is a living cultural landscape, where the connections between environment, tradition, language, and community are deeply intertwined. The application reduces heritage to mere static assets, neglecting their dynamic social, cultural, and spiritual roles within the community.

Significant shortcomings are evident in the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices, yet the assessment describes them as static features, overlooking their ongoing significance and the effects of development on their surroundings. This misrepresentation leads to an inadequate evaluation of cultural impacts and ignores their relevance to community life.

Moreover, the assessment fails to account for intangible cultural heritage, including the Gaelic language, local traditions, and the enduring relationship between the community and its coastal environment. These elements are vital to the area's identity, yet they are completely omitted from the assessment, which represents a major shortfall. Without addressing these aspects, the real cultural impact of the development remains obscured.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity and is recognised as an Indigenous People, but there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the assessment's legitimacy and does not adhere to established participation principles regarding decisions that affect cultural and environmental interests.

A fundamental procedural flaw is the failure to conduct a compliant Island Communities Impact Assessment, a requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot legally assess the social, cultural, and economic implications for the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these gaps contradict the National Planning Framework 4, particularly concerning the safeguarding of historic assets and sites. The neglect to consider both tangible and intangible heritage, as well as to acknowledge living cultural practices, represents a clear deviation from policy requirements.

In summary, the lack of assessment regarding living heritage, intangible cultural values, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not offer a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is a critical issue that undermines the integrity of 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 creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the extent of social risks identified through the developer’s own research.

Initial summaries suggest that residents are facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are a direct result of community engagement and are not speculative in nature. However, the non-disclosure of the complete assessment limits the potential for proper scrutiny of the findings and reduces the opportunity to assess their significance in the decision-making process.

Moreover, there is evidence indicating that the proposal is viewed as a threat to community identity and cohesion, with the developer noting "cultural loss" in their findings. Despite this recognition, these social impacts have not been adequately incorporated into the primary application or weighted appropriately. The failure to provide the full Social Impact Assessment obfuscates the true human and social costs

associated with the development.

This deficiency also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this magnitude, especially when considering potential effects on community character and functioning. The lack of a complete dataset impairs the application's ability to furnish a comprehensive evidential basis for evaluating the balance between benefits and potential harm.

From a policy standpoint, the application does not adequately demonstrate compliance with the National Planning Framework 4 regarding health and wellbeing. Developments are required to foster positive health outcomes and avoid harm, yet the evidence at hand points to existing adverse effects that have not been fully addressed. Without the full assessment, demonstrating compliance with this policy is unfeasible.

The procedural ramifications 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 material omission within the application and a failure to fulfil the evidential requirements of the Environmental Impact Assessment framework.

In conclusion, the failure to disclose the complete Social Impact Assessment, coupled with evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This situation precludes a lawful determination and reinforces the position that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment concerning visual, landscape, and seascape impacts is significantly inadequate and does not fully capture the extent of change or the sensitivity of the affected environment. The West Lewis coastline is characterised by an expansive Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The proposed installation of large-scale turbines near the shoreline would result in a continuous and imposing industrial presence, drastically altering this character and leading to a permanent and irreversible transformation of the landscape.

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

Concerns also arise from the methodology applied in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the

visual impact has been understated, thus questioning the reliability of the assessment.

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

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 concerning the preservation of natural spaces and historic assets. The extent of change is at odds with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertions of policy compliance.

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

Overall, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the intertwined nature of landscape and heritage. These shortcomings impede a reliable evaluation and reinforce the conclusion that the proposal does not align with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal's assessment of construction and pollution risks is markedly deficient, lacking the necessary detail for a proper evaluation of likely environmental effects. The project entails significant seabed preparation and installation operations in a challenging Atlantic environment, yet fails to present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that are to be established after consent, which undermines any meaningful assessment of their adequacy or effectiveness.

This dependence on unspecified future measures raises substantial concerns due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are at risk from sediment disturbance and potential contamination. Although the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it does not sufficiently detail how these risks will be prevented, controlled, or monitored.

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

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether adequate safeguards exist to address pollution events. This introduces procedural risks and compromises the competent authority's ability to assess environmental protection measures at the time of determination.

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

In summary, the lack of defined mitigation measures, detailed management plans, and uncertainty surrounding potential impacts collectively render the assessment materially inadequate. These deficiencies hinder a thorough evaluation of construction and pollution risks and further affirm that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal fails to provide a thorough evaluation of the socio-economic impacts and ecological effects on the local marine life and fishing industry. The waters off the West Lewis coast host a rich marine ecosystem, yet the application does not adequately demonstrate how these vital habitats can be preserved without substantial disruption.

One of the main concerns is the flawed assumption that fishing activities can be relocated without repercussions. There is a notable lack of evidence regarding the availability and accessibility of alternative fishing grounds that can bear additional pressures. This critical omission raises the risk of overfishing in other areas and could lead to broader economic repercussions for the local fishing fleet. The absence of a comprehensive assessment impedes a true understanding of the impacts on fisheries and local livelihoods.

The proposal also poses significant threats to marine species, particularly due to the underwater noise associated with construction activities. The use of high-energy hammer piling over an extended duration is likely to create disturbances that affect marine life, notably the local bottlenose dolphin population. Concerns have been raised about the anticipated disturbance to a significant portion of this population, yet the application downplays these potential effects and lacks sufficient evidence to support its claims.

Moreover, there is an apparent contradiction within the application itself. While it acknowledges the necessity of licences to allow harm to European Protected Species, it simultaneously characterises the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, particularly where anticipated harm requires legal authorisation.

The assessment does not adequately account for cumulative impacts from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a detailed consideration of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application falls short of demonstrating compliance with the National Planning Framework 4 and the National Marine Plan. It does not sufficiently prove that the proposed development can coexist with current marine users or avoid significant adverse effects on marine biodiversity, thereby failing to support the notion of sustainable development.

Overall, the absence of concrete evidence regarding fishing displacement, the underestimation of acoustic impacts, and the contradictions found within the assessment lead to a conclusion that is incomplete and unreliable. These shortcomings hinder a thorough evaluation of the implications for marine life and local 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 proposal introduces permanent red aviation lighting that will be visible over long distances, fundamentally altering the night-time environment along the West Lewis coastline. This lighting creates a continuous and intrusive “wall of light” effect across the western horizon. Such alterations pose significant threats to the area's identity, which is characterised by exceptionally dark skies that contribute to environmental quality and tourism value.

A critical omission within the Environmental Impact Assessment is the failure to evaluate the effects of this lighting on visual amenity, landscape character, or the experience of residents and visitors. This gap is significant due to the rising importance of dark skies for the area’s cultural identity and for emerging tourism sectors like astro-tourism. Furthermore, the absence of any lighting impact assessment or phototaxis study fails to address how this aviation lighting might affect nocturnal wildlife, particularly sensitive species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, which are prone to disorientation and increased collision risk due to artificial lighting.

Additionally, the reliance on daytime survey data in the ornithological assessment neglects to capture nocturnal activity and its associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

Without a proper assessment of nocturnal impacts, it cannot be determined whether protected species or designated sites would face adverse effects. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt remains unfulfilled, invoking the precautionary principle and rendering a lawful determination impossible.

From a policy standpoint, these omissions contradict National Planning Framework 4 concerning the protection of natural places and environmental quality. They also compromise the broader assessment of landscape and seascape impacts, given that night-time character is an integral aspect of the environment.

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 incapable of supporting a lawful determination.

TOURISM

The assessment of tourism impacts is fundamentally inadequate, failing to address the economic and social ramifications for a crucial sector of the Isle of Lewis economy. This sector relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. The application notes that 86% of visitors are attracted by the scenery; however, it lacks a quantified evaluation of how the proposed large-scale offshore infrastructure would influence visitor numbers, behaviours, or the overall economic contributions of tourism.

Tourism has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. In spite of this growth, the application does not consider how the proposed industrialisation of the seascape and the associated decline in environmental quality would affect Tourism Gross Value Added or broader 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 jeopardise an established and flourishing sector.

Furthermore, the assessment disregards the critical role of environmental quality in promoting tourism. It overlooks the significance of unspoiled landscapes and dark skies in shaping visitor experiences, particularly in relation to burgeoning markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment

exacerbates this shortcoming, creating a notable void in understanding the impacts on a recognised and expanding segment of the local economy.

In an island community with limited economic diversification, the omission of tourism impact assessments carries broader consequences for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately evaluated in accordance with 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 of demonstrating net benefit. Additionally, it contradicts strategic objectives that designate tourism as a priority growth sector and lacks sufficient evidence to enable the competent authority to evaluate the economic implications of the proposal.

Overall, the inability to quantify tourism impacts, assess the environmental factors driving visitor behaviours, and acknowledge the island's economic dependencies culminates in a substantial evidential deficiency. This gap hampers a thorough evaluation of the economic consequences, leading to the conclusion that the application is incomplete.

SUMMARY

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

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

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

Furthermore, the proposal is at odds with National Planning Framework 4. It does not

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

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

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

In summary, the application is procedurally and substantively unfit for determination. The numerous information deficiencies, compounded by conflicts with policy and unresolved environmental risks, prevent a lawful, evidence-based decision. The competent authority must either refuse consent on these grounds or invoke the appropriate regulatory provisions to require the submission of the necessary missing information.

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

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: 8C84FB7B

Member of the public 660

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

Dear Sir/Madam

I hereby lodge a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and proximity of the proposed turbines raise significant concerns regarding landscape capacity, visual dominance, and environmental impact, particularly given the unprecedented nature of this development in the area.

The application lacks sufficient evidential support for a lawful determination, as critical environmental data is absent, and baseline information is both limited and inconsistent. Key elements of the proposal remain undefined, and the use of a flexible design framework complicates the assessment of likely significant effects. Furthermore, reliance on unspecified mitigation measures means their effectiveness cannot be evaluated, resulting in documentation that does not provide a comprehensive understanding of the environmental, cultural, or community impacts. Consequently, claims of negligible or non-significant effects are not substantiated by robust evidence.

There are substantial policy conflicts evident within the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application fails to show compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These inconsistencies directly affect the statutory tests necessary for consent and hinder the competent authority's ability to ascertain the proposal's acceptability in policy terms.

Taken together, the absence of adequate information, the reliance on undefined mitigation measures, and the evident policy non-compliance highlight that the application is incomplete. In these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report submitted is fundamentally inadequate and lacks a comprehensive, transparent, and dependable account of the anticipated environmental impacts of the proposed development. The introduction of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for the turbines, creates considerable uncertainty. This uncertainty hinders the ability to apply a worst-case scenario consistently, thereby undermining the

integrity of the assessment. Consequently, the impacts presented may not accurately reflect the actual development, leaving both the public and the competent authority without a clear understanding of the true environmental effects.

Furthermore, the application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. This results in seeking consent on the premise that any environmental harm will be managed at a later date. Such a deferral to post-consent stages hinders any meaningful evaluation of effectiveness or assessment of residual impacts. This procedural approach is unacceptable and contradicts the purpose of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies must be clearly established before a determination can be made.

There are notable evidential shortcomings, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially where conclusions are drawn about negligible or non-significant effects without robust supporting data. The lack of adequate information precludes a clear understanding of cumulative and worst-case impacts, and introduces scientific uncertainty that cannot meet statutory requirements.

As a result, the application does not satisfy the evidential threshold stipulated under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate alignment with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, since it cannot be established that impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the dependence on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and robust assessment of environmental effects, leaving the competent authority unable to make a determination based on the information presented.

ASSESSMENT OF ALTERNATIVES

The proposed application does not adequately assess alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of providing a structured and reasoned comparison of realistic alternatives based on environmental effects, it presents a narrative account of project evolution. This method does not demonstrate that the developer has properly identified, assessed, and selected less harmful options in preference to more damaging solutions.

Moreover, there is a lack of transparent and evidence-based comparisons of alternative offshore locations, development scales, or design configurations. Notably, the

application does not indicate that the possibility of placing turbines further offshore has been seriously considered, where it is likely that visual, ecological, and coastal impacts would be reduced. The sensitivity of the West Lewis coastline and the importance of proximity to shore in determining impact highlight the need for such analysis. The failure to include this information prevents any conclusion that the proposed siting represents the least damaging option.

These shortcomings also apply to cable routing and landfall assessment. Insufficient evidence is provided to show that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The absence of a clear avoidance strategy and a lack of comparative analysis suggest that mitigation by design has not been implemented, relying instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This lack of adherence to the established mitigation hierarchy hinders the competent authority's ability to ascertain whether less harmful and more appropriate alternatives exist. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency compromises compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a material omission, contributing to the overall conclusion that the application has not been adequately assessed and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

Further shortcomings are evident in the assessment of basking sharks, where reliance

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with the development application is materially flawed, containing significant gaps in evidence and internal inconsistencies that cast doubt on its conclusions. The application has not demonstrated to the required evidential standard that these species will not be adversely affected, particularly given that the development is situated within key foraging areas and migratory pathways. The implications of displacement, collision risk, and habitat loss have not been robustly evaluated.

There exists a fundamental contradiction within the application, as the developer concludes that there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case. This derogation is only necessary when significant harm is expected, raising questions about the reliability of the assessment and indicating that the conclusions are unsupported by the underlying evidence. The application fails to provide sufficient evidence that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not fully accounted for, and the use of modelling approaches introduces uncertainty, particularly for species like Kittiwakes

and Fulmars that are in severe decline. Methodologies applied are likely to underestimate mortality, especially where baseline data is incomplete and behavioural responses are not fully understood.

Moreover, the siting of turbines within a recognised migratory corridor introduces an additional risk by creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not adequately assess the long-term implications of sustained mortality within this corridor or the potential effects on species that have relatively small global populations. From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, data gaps, and limitations in modelling means that the standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle, preventing a lawful conclusion that would support consent.

The deficiencies identified also signify a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence, preventing a robust evaluation of impacts and contributing to the conclusion that the application does not meet the statutory requirements necessary for determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is severely lacking, failing to adequately reflect both the sensitivity of the receiving environment and the scale of the proposed changes. The coastline of West Lewis is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The introduction of large-scale turbines close to the shoreline would result in a continuous industrial presence that fundamentally alters this character, leading to a permanent and irreversible transformation of the landscape.

The proposal does not adequately convey the extent of this visual change. The proximity and scale of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would directly diminish visual amenity and erode the defining attributes of naturalness and remoteness. Moreover, the assessment fails to fully articulate the significance of these impacts in the context of such a sensitive landscape.

Methodological issues are also present in the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, thus compromising the reliability of the assessment.

There is a notable deficiency in recognising the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are linked to the wider landscape through visual and spatial relationships to the Atlantic horizon. The assessment treats these important cultural assets as isolated rather than acknowledging their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The potential industrialisation of the seascape could sever these crucial relationships, transforming the context in which heritage assets are perceived and interrupting their connection to the natural horizon. This not only constitutes a visual impact but also represents broader cultural and spatial harm that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal contravenes National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The extent of change proposed is incompatible with the obligation to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further undermines any assertions of policy compliance.

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

Overall, the assessment fails to accurately portray the scale of impact, the environmental sensitivity, and the interconnectedness of landscape and heritage. These shortcomings inhibit a reliable evaluation and reinforce the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal's assessment of construction and pollution risks is notably inadequate, failing to provide the necessary detail for evaluating potential environmental effects. Notably, significant seabed preparation and installation activities will occur within a high-energy Atlantic environment. However, the application lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans, relying instead on mitigation and contingency measures that will be formulated after consent. This approach hinders any meaningful assessment of the adequacy or effectiveness of these measures.

Particularly alarming is the reliance on undefined future measures, given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are at risk from sediment disturbance and contamination.

While the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on prevention, control, or monitoring strategies.

Furthermore, there is considerable uncertainty surrounding the scale and behaviour of sediment plumes created by seabed disturbance and cable installation. Without comprehensive modelling and clearly defined management strategies in place, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty is compounded by potential effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

The lack of detailed emergency response procedures intensifies these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether sufficient safeguards are established to address pollution events. Such a deferral introduces procedural risks and diminishes the ability of the competent authority to assess environmental protection measures effectively at the point of determination.

From a regulatory standpoint, this deferral of essential environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. Assessments of likely significant effects and mitigation must occur prior to consent, and the absence of such information precludes a lawful determination. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is incomplete and does not account for the full range of impacts related to this single integrated project. The offshore turbines and the onshore works are interconnected, yet they are evaluated separately. This fragmented approach obscures the true scale of both environmental and socio-economic effects.

Onshore components include cabling that crosses protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure through sensitive landscapes. This work involves excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and ecologically sensitive habitat. The application lacks a comprehensive assessment of these impacts, which hinders a complete understanding of the project's overall environmental footprint.

Furthermore, by excluding or delaying the evaluation of onshore impacts, the application fails to allow for a proper examination of cumulative effects. The Environmental Impact Assessment process requires that all elements of a project are reviewed together. However, the separation of offshore and onshore components leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

There are also considerable risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not prove that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, resulting in a significant evidential gap concerning biodiversity protection.

Concerns regarding carbon balance are raised as well. The disturbance of peatland could release stored carbon, leading to a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this issue or demonstrate that the overall carbon balance remains beneficial.

Moreover, routing infrastructure through active croft land may introduce conflicts with current land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, which raises doubts about its deliverability and lawful implementation.

From a policy viewpoint, the failure to assess the project as a whole, along with inadequate protection for 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.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances, fundamentally altering the night-time environment along the West Lewis coastline. This lighting creates a continuous and intrusive “wall of light” effect across the western horizon. Such alterations pose significant threats to the area's identity, which is characterised by exceptionally dark skies that contribute to environmental quality and tourism value.

A critical omission within the Environmental Impact Assessment is the failure to evaluate the effects of this lighting on visual amenity, landscape character, or the experience of residents and visitors. This gap is significant due to the rising importance of dark skies for the area’s cultural identity and for emerging tourism sectors like astro-tourism. Furthermore, the absence of any lighting impact assessment or phototaxis

study fails to address how this aviation lighting might affect nocturnal wildlife, particularly sensitive species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are prone to disorientation and increased collision risk due to artificial lighting.

Additionally, the reliance on daytime survey data in the ornithological assessment neglects to capture nocturnal activity and its associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

Without a proper assessment of nocturnal impacts, it cannot be determined whether protected species or designated sites would face adverse effects. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt remains unfulfilled, invoking the precautionary principle and rendering a lawful determination impossible.

From a policy standpoint, these omissions contradict National Planning Framework 4 concerning the protection of natural places and environmental quality. They also compromise the broader assessment of landscape and seascape impacts, given that night-time character is an integral aspect of the environment.

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 incapable of supporting a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development when evaluated against statutory responsibilities, national policy, and evidential standards. The application mirrors the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This new application, however, is being assessed within a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

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

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

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

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

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

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

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

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: 6DAA309B

Member of the public 661

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. Upon reviewing the Environmental Impact Assessment Report and associated documentation, it is clear that there are significant deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. 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 rich cultural heritage. Concerns regarding the scale, proximity, and design of the development raise fundamental questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis necessary for a lawful determination. There is a concerning absence of critical environmental data, and the baseline information provided is limited and inconsistent. Key elements of the proposal remain undefined, and the use of a flexible design framework obscures a clear understanding of the likely significant effects. Furthermore, the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive or informed understanding of the environmental, cultural, or community impacts, while claims regarding negligible or non-significant effects are unsupported by robust evidence.

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

The scale of this proposal is unprecedented for the area, with large turbines planned to be placed in close proximity to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation measures, evidential weaknesses, and evident policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. In light of these circumstances, it is essential that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

Consequently, the application does not meet the evidential threshold stipulated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, including requirements for biodiversity protection and environmental integrity, as it cannot be confirmed that impacts have been fully assessed or that appropriate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application fails to meet the statutory requirements of the Environmental Impact Assessment regime due to an inadequate assessment of alternatives. Rather than offering a structured comparison of viable alternatives based on environmental

impacts, it provides a narrative detailing the project's evolution. This method does not sufficiently demonstrate that less harmful options have been identified, evaluated, and chosen over more damaging ones.

There is a lack of transparent and evidence-based analysis regarding alternative offshore locations, scales of development, or design configurations. Specifically, the application does not indicate that the developer has meaningfully considered the potential of placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts could be lessened. Given the sensitivity of the West Lewis coastline, the crucial importance of proximity to shore in assessing impacts makes this absence of analysis particularly significant and obstructs any conclusion that the proposed siting is the least damaging available option.

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

Consequently, the application does not show that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This signifies a failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it is impossible to conclude that the proposal is a sustainable or compliant solution according to policy standards.

From a policy viewpoint, this inadequacy undermines adherence to National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment constitutes a material omission, contributing to the overall conclusion that the application has not been adequately evaluated and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is fundamentally lacking and fails to offer a thorough understanding of ecological receptors in the West Lewis coastal environment. This area is not only highly sensitive but also biologically active. However, the baseline data provided is incomplete, and the methodologies used do not sufficiently capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

One significant shortfall pertains to otters, a European Protected Species. The

application does not adequately recognise or assess their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns leaves unassessed the potential effects arising from construction disturbance, noise, and increased activity. This oversight weakens any conclusions drawn regarding the absence of significant effects on this species.

There are also notable deficiencies in the assessment of basking sharks, where the reliance on aerial surveys introduces considerable detection bias, particularly in Atlantic conditions. This methodology is likely to underestimate their presence, especially when compared to established land-based observations that indicate these waters are used frequently. The neglect to incorporate or adequately consider such data results in an incomplete baseline, thereby undermining the reliability of the conclusions presented.

These methodological shortcomings mean that any conclusions suggesting negligible or non-significant effects are grounded in assumptions rather than on robust evidence. The lack of sufficient baseline data hinders meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the actual scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria outlined in the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to properly identify or assess protected species. The uncertainty introduced by these omissions prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. In light of these circumstances, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions results in an unreliable assessment. These deficiencies obstruct a robust evaluation of the impacts on marine ecology and protected species and lead to the overarching conclusion that the application is devoid of a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application proposes the development of turbines within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which is home to internationally important seabird populations that are already in decline. However, the ornithological assessment is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. It fails to demonstrate to the required evidential standard that these species will not be adversely affected.

The assessment does not sufficiently account for the importance of feeding grounds associated with protected sites such as the Lewis Peatlands and St Kilda. The reliance on modelling approaches introduces uncertainty, particularly for species in severe decline, like Kittiwakes and Fulmars. Furthermore, the methodologies applied are likely

to underestimate mortality due to incomplete baseline data and a lack of understanding of behavioural responses.

A fundamental contradiction exists within the application; the developer concludes that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only needed when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and the support for the conclusions drawn.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is fundamentally flawed, as it does not recognise the West Lewis coastline as a vibrant cultural landscape where environment, tradition, language, and community are interconnected. The approach taken in the application reduces heritage to mere isolated assets, neglecting their ongoing cultural, spiritual, and social significance within the community.

A major shortcoming is the treatment of culturally significant sites, such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites are active burial grounds and places of spiritual practice, yet they are classified as static features in the assessment. This mischaracterisation fails to account for their continued use, the significance they hold, and the implications of development on their surroundings. Consequently, this results in an incomplete understanding of the cultural effects and ignores their importance to community life.

Moreover, the application overlooks intangible cultural heritage elements, including the Gaelic language, local traditions, and the historical relationship between the community and the coastal environment. These factors are integral to the area's identity, yet they are completely absent from the assessment, creating a significant gap. Without these considerations, the cultural impact of the proposed development cannot be accurately gauged.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity recognised as characteristics of an Indigenous People, but there has been no process of Free, Prior and Informed Consent implemented. The lack of meaningful engagement undermines the legitimacy of the assessment and does not adhere to established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural issue is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot legally assess the social, cultural, and economic impacts on the island community. This omission alone renders the determination of the proposal unlawful.

From a policy perspective, these deficiencies place the proposal in direct conflict with National Planning Framework 4, particularly regarding the protection of historical assets and places. The neglect to address both tangible and intangible heritage and to acknowledge living cultural practices represents a significant departure 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 remain inadequately assessed, and the application does not provide an adequate foundation for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing associated with the proposed development is fundamentally inadequate and lacks the necessary transparency for a lawful appraisal. While the developer has commissioned a Social Impact Assessment that included focus groups with local residents, the complete report has not been made available. This omission creates a significant evidential gap, hindering both public awareness and the competent authority's understanding of the social risks identified in the developer’s own research.

Evidence suggests that residents are currently experiencing tangible stress, anxiety, and concern due to the scale and proximity of the proposal. These concerns arise from direct engagement with the community and are thus grounded in reality rather than speculation. However, the failure to release the full assessment limits proper scrutiny of these findings and restricts the ability to evaluate their significance in the decision-

making process.

Furthermore, the proposal is perceived as a threat to community identity and cohesion, with "cultural loss" cited in the developer's own findings. Despite the acknowledgment of these impacts, they have not been adequately incorporated into the primary application nor afforded the necessary weight in the decision-making process. The lack of availability of the full Social Impact Assessment obscures the genuine human and social costs of the proposed development.

This deficiency in transparency undermines the Environmental Impact Assessment process, as a comprehensive understanding of the social, economic, and health implications is vital for developments of this nature, particularly in relation to community character and functionality. The absence of the complete dataset means that the application does not provide a thorough evidential basis for weighing benefits against potential harm.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 regarding health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm; however, the evidence at hand indicates existing adverse effects that remain undisclosed. Without access to the full assessment, it is impossible to verify compliance with this policy.

The procedural consequences are considerable. The competent authority is unable to conduct a comprehensive socio-economic and health evaluation without the complete Social Impact Assessment, marking a significant omission within the application and a failure to fulfill the evidential demands of the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the full Social Impact Assessment, in conjunction with documented evidence of current adverse impacts, renders the overall assessment incomplete and unreliable. This situation precludes a lawful determination and underlines the assertion that the application is unsupported by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of the potential impacts on the seascape, landscape, and visual environment is significantly lacking and does not reflect the true scale of change nor the sensitivity of the area affected. The character of the West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would result in a continuous and overwhelming industrial presence, fundamentally changing this character and leading to a permanent and irreversible transformation of the landscape.

Moreover, the application fails to adequately depict the extent of the anticipated visual changes. Given the scale and proximity of the turbines, they would overshadow 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 does not sufficiently illustrate this impact or its significance within the context of such a sensitive landscape.

Concerns also arise from the methodology employed in the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not accurately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the true magnitude of the visual impact has been underestimated, casting doubt on the reliability of the assessment.

A critical shortcoming is the lack of analysis regarding the interconnected relationship between the landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting connected visually and spatially to the Atlantic horizon. The assessment fails to acknowledge their interdependence, treating these heritage sites as isolated entities, which results in an incomplete assessment of the impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal directly contradicts the principles outlined in National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The extent of change posed by the project is incompatible with the necessity to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case scenario assessment further undermines any assertion of policy conformity.

It is evident that the impacts identified cannot be suitably mitigated. Due to the scale, height, and proximity of the turbines, their presence would be prominent and unavoidable. Thus, the resulting change is fundamental and permanent, incapable of being diminished to an acceptable level through any form of mitigation.

Collectively, the assessment inadequately represents the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings obstruct a reliable evaluation and reinforce the conclusion that the proposal is at odds with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks lacks completeness and does not contain the necessary details for a thorough assessment of likely environmental effects. This proposal entails extensive seabed preparation and installation activities in a challenging Atlantic environment, yet it lacks fully developed Construction

Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that are to be formulated after consent, thereby obstructing any meaningful appraisal of their sufficiency or effectiveness.

This reliance on unspecified future actions is particularly alarming due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to sediment disturbance and contamination. Although the application recognises risks associated with sediment mobilisation and potential chemical or oil spills, it does not furnish adequate detail on how these issues will be averted, managed, or monitored.

Moreover, there exists uncertainty regarding the magnitude and behaviour of sediment plumes generated by seabed disturbance and cable installation. In the absence of robust modelling and explicitly defined management strategies, it is impossible to ascertain the extent, duration, or ecological implications of these effects. This uncertainty also pertains to the possible consequences for marine species and habitats that have already been designated as sensitive within the broader assessment.

The lack of thorough emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether sufficient safeguards are in place to address pollution incidents. This introduces procedural risks and diminishes the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, the postponement of essential environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to granting consent, and in the absence of such information, a lawful decision cannot be reached. The application also fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, absence of detailed management plans, and uncertainty surrounding potential impacts render the assessment fundamentally inadequate. These deficiencies hinder a comprehensive evaluation of construction and pollution risks and further affirm that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of the proposed development lacks a robust evaluation of ecological and socio-economic impacts, particularly concerning fisheries and marine life. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application does not adequately demonstrate that these habitats and uses can be preserved without substantial disruption.

A major concern is the erroneous assumption that fishing activity can be displaced without any consequences. The application fails to provide evidence that there are alternative fishing grounds that are available, accessible, or able to support the

additional pressure that displacement would create. This oversight is critical, as such displacement could lead to overfishing in other areas and potentially have broader economic repercussions for the local fishing fleet. In the absence of a clear, evidence-based assessment, the potential impacts on fisheries and the livelihoods they support remain poorly understood.

Furthermore, the proposal poses significant risks to marine species, primarily due to the underwater noise generated during construction. The use of high-energy hammer piling over extended periods is likely to disturb marine life over considerable distances, particularly affecting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population raises serious concerns, yet the application downplays these effects without providing adequate supporting evidence.

There exists a notable inconsistency within the application, where the necessity for licences to permit harm to European Protected Species is recognised, while the impacts are simultaneously portrayed as negligible. This contradiction calls into question the credibility of the assessment and raises serious concerns regarding adherence to the Habitats Regulations, especially in situations where harm may require legal authorisation.

Additionally, the assessment does not adequately consider the cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, it remains impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It does not substantiate that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby impeding any conclusion regarding the proposal's sustainability.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is fundamentally lacking and does not consider the full range of impacts stemming from what constitutes a single integrated project. The offshore turbines and the associated onshore works are interconnected, yet they have been evaluated separately. This fragmented approach obscures the true extent of both environmental and socio-economic effects.

Among the onshore elements are cabling through protected moorland, the construction

of a substation near Stornoway, and the necessary access infrastructure that traverses sensitive landscapes. These activities entail excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The application fails to provide a thorough assessment of these impacts, thereby hindering a complete understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components are considered collectively; however, the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are inadequately understood.

Significant risks to sensitive habitats, including machair systems and peatland environments, are also present and are afforded policy protection. The application does not adequately demonstrate that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented. This results in a clear evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. The disturbance of peatland has the potential to release stored carbon, thereby creating a carbon debt that contradicts the objectives of renewable energy development. The application does not sufficiently address this matter or show that the overall carbon balance remains positive.

Furthermore, routing infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, which raises serious questions about the deliverability and lawful implementation of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The application fails to assess the impacts on nocturnal wildlife, which is a critical oversight. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are notably sensitive to artificial lighting, as it can lead to disorientation and an increased risk of collision. There is no lighting impact assessment or phototaxis study included in the proposal, which means it does not evaluate how the introduction

of aviation lighting may affect these species or contribute to increased mortality rates.

Furthermore, reliance on daytime survey data in the ornithological assessment neglects nocturnal activity and the associated risks. Kittiwakes, which may forage or migrate at night, are similarly vulnerable to disorientation caused by artificial lighting, yet this potential risk has not been investigated. The lack of specific night-time data leaves a significant gap in understanding the ecological impacts that may arise.

The proposal introduces permanent red aviation lighting, which would be visible over long distances, resulting in a continuous and intrusive “wall of light” effect across the western horizon. This change would fundamentally alter the night-time environment and is not assessed for its impact on visual amenity, landscape character, or the experiences of residents and visitors. Given the West Lewis coastline's exceptionally dark skies, which are integral to its environmental quality, cultural identity, and tourism value, this omission is substantial.

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

From a policy standpoint, the lack of assessment conflicts with National Planning Framework 4 regarding the protection of natural places and environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the night-time character is a vital component of the environment. Collectively, the failure to consider dark skies and nocturnal wildlife creates a considerable evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unable to support a lawful determination.

TOURISM

The evaluation of tourism impacts within the application is significantly lacking, particularly regarding the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Although it is noted that 86% of visitors are attracted by the scenery, there is no quantitative assessment provided regarding how the proposed large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution of tourism.

The growth of tourism has been notable, with its contribution rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for up to 16% of the island’s economy. Despite this positive trajectory, the application fails to model the potential impact of seascape industrialisation and the degradation of environmental quality on Tourism Gross Value Added and broader economic resilience. Without such necessary analysis, it is impossible to ascertain whether the proposed development would provide a net economic benefit or harm an already established and

expanding sector.

Additionally, the assessment neglects to acknowledge the significance of environmental quality in fostering tourism, specifically regarding the role of unspoiled landscapes and dark skies in enhancing visitor experiences. This oversight is particularly concerning given the rise of niche markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, creating a considerable gap in understanding the effects on a recognised and developing segment of the local economy.

In light of the limited economic diversification within the island community, the failure to assess tourism impacts has broader consequences for employment, local businesses, and community sustainability. Furthermore, the absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated, as required by the Islands (Scotland) Act 2018.

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

In summary, the inability to quantify tourism impacts, assess the environmental factors that influence visitor behaviour, and recognise the island's economic dependencies has resulted in a significant evidential gap. This gap hinders a comprehensive evaluation of the economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development as defined by statutory duties, national policy, and evidential standards. It mirrors the critical issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This current application, however, is presented within a more stringent policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Significant gaps in the evidential basis for the application hinder its determination. The reliance on an undefined design envelope, unspecified mitigation measures, and the failure to address key impact pathways—including effects on nocturnal wildlife, complete onshore infrastructure, and tourism—renders the Environmental Impact Assessment incomplete. Consequently, it does not provide a full understanding of likely significant effects or residual impacts.

Moreover, there are procedural shortcomings present. The failure to conduct a compliant Island Communities Impact Assessment breaches statutory duties under

the Islands (Scotland) Act 2018. Additionally, the lack of a full Social Impact Assessment constitutes a significant omission, preventing the competent authority from evaluating effects on community wellbeing, cultural identity, and economic resilience. These deficiencies are substantial enough to render the application unfit for determination.

The proposal is also at odds with National Planning Framework 4, failing to safeguard biodiversity, natural landscapes, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable, nor does it provide evidence of 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 adequately assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals, coupled with internal inconsistencies, have not met the evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle and hinders the ability to lawfully conclude that the impacts are acceptable.

The proposal is poised to cause substantial and irreversible changes to a highly sensitive landscape. It threatens to industrialise the Atlantic-facing coastline, disrupt dark skies, alter cultural and visual relationships, and negatively impact tourism, resulting in permanent effects that cannot be mitigated satisfactorily.

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

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

Additional Comments

There can be no doubt that should the proposal for the Spiorad Na Mara Windfarm become a reality, that all life in our beautiful beloved island will be ruined forever. We are facing, without our consent, the prospect of our entire environment being literally sold off from under us to foreign corporations so that they can tear up our land and sea entirely for their profit. No amount of money, never mind the little crumbs which might or might not be on offer, could possibly recompense for the destruction of our land and seas.

It is a known fact that sustainable sources of energy should be developed close to where it is required. It is an act of supreme cowardice to choose to turn a small

community, far away from the centres of population and industry, into a huge and grotesque industrial wasteland. It is also a tragedy that we are made to feel that we and our precious homeland have no worth beyond corporate profit.

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: 806EC1FD

Member of the public 662

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed, resulting in an incomplete understanding of ecological receptors within the West Lewis coastal environment. This marine system is notably sensitive and biologically active, yet the methodologies employed have not adequately captured essential data

regarding species presence, behaviour, and habitat use. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

A significant oversight is the failure to appropriately assess otters, which are classified as a European Protected Species. The application does not recognise their active use of coastal areas for foraging and movement, and it inadequately addresses their core foraging range and behavioural patterns. This neglect means the potential effects of construction disturbance, noise, and increased human activity remain unassessed, undermining any claims regarding the absence of significant effects on this species.

Furthermore, the evaluation of basking sharks suffers from serious deficiencies due to a reliance on aerial surveys, which can introduce substantial detection bias, particularly under Atlantic conditions. This method is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate frequent use of the area. The omission of relevant data weakens the integrity of the baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects being based on assumptions rather than sound evidence. The lack of sufficient baseline data hampers the ability to conduct a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This absence of clarity creates uncertainty regarding the actual risks faced by marine species and their habitats.

From a regulatory standpoint, the application fails to satisfy the stipulations of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or evaluated. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt and necessitates the invocation of the precautionary principle. Therefore, consent cannot be lawfully granted under these circumstances.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These significant deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species and ultimately indicate that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application contains significant deficiencies that compromise its reliability, stemming from internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. Notably, the application does not meet the required evidential standard to demonstrate that internationally important seabird populations, particularly those associated with protected sites such as the Lewis Peatlands and St Kilda, will not be adversely affected. The assessment overlooks the importance of these feeding grounds and relies on modelling approaches that introduce uncertainty,

especially for declining species like Kittiwakes and Fulmars. Furthermore, there is a fundamental contradiction in the developer's conclusions, as they assert no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated.

The site for the development is situated within key foraging areas and migratory pathways, yet the assessment inadequately evaluates the implications of displacement, collision risk, and habitat loss. The placement of turbines within a recognised migratory corridor raises additional concerns, as it poses a significant risk by creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term consequences of potential sustained mortality in this corridor have not been adequately addressed, particularly for species with relatively small global populations.

From a regulatory standpoint, the application fails to satisfy the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and limitations in the modelling process indicates that the necessary standard of beyond reasonable scientific doubt has not been met. This engages the precautionary principle and obstructs a lawful conclusion that would support consent.

Moreover, the identified deficiencies represent non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that important seabird populations will not face adverse effects places the proposal in direct conflict with national policy. Collectively, these factors culminate in a conclusion that the assessment is unreliable and that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline represents a living cultural landscape where environment, language, tradition, and community are intricately linked. The assessment of cultural heritage and community identity fails to recognise this connection, adopting a reductive view that treats heritage merely as a collection of static assets. It neglects to acknowledge the ongoing social, cultural, and spiritual functions these heritage sites serve within the community.

Cemeteries at Dalmore, Bragar, and Barvas are examples of culturally significant sites that are active places of burial and spiritual practice. However, the assessment inaccurately categorises them as static features, overlooking their continued use and meaning while failing to consider the impact of development on their setting. This mischaracterisation leads to an incomplete understanding of cultural effects and dismisses their importance in community life.

Additionally, the assessment does not address intangible cultural heritage, such as the Gaelic language and local traditions, nor does it recognise the longstanding relationship between the community and the coastal environment. These elements are

crucial to the area's identity but are entirely absent from the evaluation, representing a significant oversight. Without acknowledging these factors, the true cultural impact of the development remains poorly understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the credibility of the assessment and fails to align with established principles of participation in cultural and environmental decisions.

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

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

Ultimately, the neglect to assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application without a sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The 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.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts and landscape changes presented in the application is fundamentally inadequate. It does not truly capture the scale of transformation nor the sensitivity of the environment affected. The West Lewis coastline, characterised by its expansive Atlantic horizon and an unspoiled, remote character, would face significant alterations with the introduction of large-scale turbines near the shoreline. This would establish a constant industrial presence, leading to an irreversible and profound change in the landscape.

Moreover, the visual consequences of this proposal have not been accurately portrayed. The turbines, due to their size and closeness to residential areas, historic sites, and popular coastal regions, would dominate views, severely impacting visual amenity and diminishing the area's essential qualities of naturalness and remoteness. The assessment falls short of adequately expressing the significance of this impact in light of the area's sensitivity.

Concerns also arise regarding the methods employed in selecting and displaying visual viewpoints. Evidence indicates that these viewpoints may not represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This situation raises the possibility that the visual impact has been downplayed, thereby undermining the overall reliability of the assessment.

Additionally, there is a notable failure to evaluate the intertwined relationship between landscape, seascape, and cultural heritage. Important sites, including the Calanais Standing Stones and other Scheduled Monuments, are intricately linked to the wider landscape through visual and spatial connections to the Atlantic horizon. The assessment incorrectly treats these sites as isolated entities rather than acknowledging their interrelatedness, resulting in an incomplete understanding of how impacts affect 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 disruption but a broader cultural and spatial detriment that has not been sufficiently evaluated within the application.

From a policy standpoint, this proposal stands in direct conflict with the National Planning Framework 4, which seeks to protect both natural environments and historic assets. The magnitude of the proposed changes is not compatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a thorough worst-case assessment diminishes any assertion of compliance with relevant policy.

It is also evident that the identified impacts cannot be adequately mitigated. Given the turbines' scale, height, and proximity, their presence would be overwhelming and inescapable. Consequently, the change introduced by this development is both fundamental and permanent, rather than something that could be lessened to an acceptable degree through mitigation measures.

Overall, the assessment fails to convey the true scale of the impact, the environmental sensitivity, and the interconnectedness of landscape and heritage. These shortcomings obstruct a reliable evaluation and reinforce the conclusion that the proposal is fundamentally incompatible with the necessary protections for this landscape.

FISHERIES AND MARINE LIFE

The application presents a number of significant deficiencies in its assessment of marine life and fisheries, leading to an inadequate understanding of the ecological and 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 does not convincingly demonstrate the ability to protect or sustain these critical uses and habitats without causing substantial disruption.

A major concern lies in the erroneous assumption that displacing fishing activities will occur without negative repercussions. There is no evidence provided that indicates the availability of alternative fishing grounds that are both accessible and capable of sustaining the additional pressure that may result. This absence is crucial, as displacement could lead to overfishing in other areas and bring about significant economic ramifications for the local fishing fleet. The impacts on fisheries and local livelihoods remain unclear without a thorough and evidence-based assessment.

The proposal also poses considerable risks to marine species, especially due to the underwater noise associated with construction activities. The high-energy hammer piling anticipated over a prolonged period is likely to create disturbances that extend over large distances, potentially impacting species like dolphins. The predicted disturbance to a notable portion of the local bottlenose dolphin population raises alarming concerns, yet these effects are inadequately addressed in the application, which downplays their significance without adequate supporting evidence.

Furthermore, there is a clear inconsistency in the application where the necessity for licences to permit harm to European Protected Species is acknowledged, while the impacts are concurrently described as negligible. This contradiction undermines the credibility of the assessment and raises significant questions regarding compliance with the Habitats Regulations, particularly when harm is expected to a degree that would legally require authorisation.

The evaluation does not adequately take into account cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough consideration of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains indeterminate.

From a policy standpoint, the application does not establish compliance with the National Planning Framework 4 or the National Marine Plan. It fails to provide evidence that the proposed development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, casting doubt on whether this proposal qualifies as sustainable development.

In summary, the lack of evidence regarding the displacement of fishing activities, the underestimation of acoustic impacts, and the internal inconsistencies in the application contribute to an incomplete and unreliable assessment. These flaws hinder the ability to thoroughly evaluate the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application for the proposed project is fundamentally flawed due to its incomplete assessment of onshore infrastructure, which fails to capture the full extent of impacts stemming from an integrated project. The connection between offshore turbines and onshore works has not been adequately acknowledged, leading to a fragmented evaluation that obscures the true environmental and socio-economic consequences.

The onshore components encompass cabling across protected moorland, construction of a substation near Stornoway, and necessary access routes through sensitive landscapes. These activities involve excavation in areas of deep peat, especially within Barvas Moor, which is both an ecologically sensitive habitat and a significant carbon store. The lack of a comprehensive assessment of these impacts prevents an accurate understanding of the project's overall environmental footprint.

By omitting a thorough evaluation of onshore impacts or deferring them, the application obstructs a proper appraisal of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered collectively, yet the disjointed approach towards offshore and onshore elements means the combined repercussions on peatlands, habitats, and surrounding communities remain inadequately understood.

There are also serious threats to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application has not substantiated that impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This creates a significant evidential gap regarding the protection of biodiversity.

Moreover, the disturbance of peatland raises critical concerns about carbon balance, as it releases stored carbon, potentially leading to a carbon debt that contradicts renewable energy objectives. The application does not sufficiently address this issue or prove that the overall carbon balance is still favourable.

Routing infrastructure through active croft land introduces potential conflicts with established land use and legal rights. The application lacks evidence that essential consents or processes have been commenced, which raises concerns about deliverability and lawful execution.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment concerning dark skies and nocturnal wildlife is a significant omission within the Environmental Impact Assessment, which undermines the integrity of the proposal. The West Lewis coastline is known for its exceptionally dark skies, which contribute significantly to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, which would be visible over long distances, is likely to create an intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Given the critical role dark skies play in the area’s identity and the emerging astro-tourism sector, this oversight represents a notable gap in the overall landscape and environmental assessment.

Equally concerning is the absence of any evaluation regarding the effects on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting, which can result in disorientation and a heightened risk of collision. The application lacks a lighting impact assessment or a phototaxis study, thereby failing to ascertain how the aviation lighting might affect these species or contribute to increased mortality.

Additionally, the reliance on daytime survey data in the ornithological assessment is inadequate, as it does not account for nocturnal activity or the associated risks. Kittiwakes, for instance, may forage or migrate at night and are also susceptible to disorientation caused by artificial lighting; however, this risk remains unassessed. The failure to gather site-specific night-time data creates a critical void in understanding the ecological impacts of the proposal.

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

From a policy perspective, this omission contradicts the National Planning Framework 4, particularly concerning the protection of natural places and the maintenance of environmental quality. Additionally, it detracts from a comprehensive evaluation of landscape and seascape impacts, as the character of night-time is an essential aspect of the environment.

Collectively, the absence of assessments regarding dark skies and nocturnal wildlife constitutes a significant evidential gap. The deficiency of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of supporting a lawful determination.

TOURISM

The assessment of tourism impacts related to the proposed development is fundamentally inadequate and does not address the economic and social repercussions for a crucial sector of the Isle of Lewis economy. The area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are vital to tourism, which has seen substantial growth, with revenue increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and constituting up to 16% of the island's economy. Despite acknowledging that 86% of visitors are motivated by scenery, the application fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of tourism.

Furthermore, the application does not model the potential impacts of seascape industrialisation and environmental degradation on Tourism Gross Value Added or the broader economic resilience of the island. Without this critical analysis, it remains unclear whether the development could result in a net economic benefit or detract from an established and burgeoning sector.

The assessment neglects to consider the significance of environmental quality in enhancing the tourism experience, particularly regarding the value of unspoiled landscapes and dark skies for visitors, as well as emerging markets like nature-based

tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a notable void in understanding the impacts on a recognized and expanding segment of the local economy.

Given the island's limited economic diversification, the failure to evaluate tourism impacts poses broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been assessed as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly concerning economic impact and the requirement to demonstrate net benefits. It also contradicts strategic objectives that identify tourism as a priority growth sector and lacks sufficient evidence to enable the competent authority to evaluate the economic implications of the proposal.

Overall, the shortcomings in quantifying tourism impacts, analysing environmental influences on visitor behaviour, and acknowledging the island's economic reliance culminate in a significant evidential gap, undermining the ability to conduct a thorough evaluation of the economic effects and leading to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development as outlined in statutory duties, national policy, and evidential standards. The proposal raises the same core issues that resulted in the refusal of the Lewis Wind Power application in 2008, where the level of industrialisation was deemed unacceptable. Presenting this application under a strengthened policy framework, which places greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing, does not address the fundamental shortcomings.

Critical gaps in baseline data hinder a complete and reliable evidential basis for assessment. The proposal continues to rely on an undefined design envelope and on unspecified mitigation measures, while omitting important impact pathways such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism consequences. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of the likely significant effects or residual impacts.

There are evident procedural failures within the application. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to disclose a full Social Impact Assessment represents a material omission. These inadequacies prevent the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for

determination.

In addition, the proposal contradicts the National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. There is no evidence presented that health and wellbeing impacts are acceptable, nor is there any modelling of tourism impacts to support claims of net economic benefit. The assessment of cumulative impacts from offshore and onshore elements is insufficient, 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 inconsistent. The evidential threshold required to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful determination of acceptable impacts.

Moreover, the proposal is poised to 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 negative implications for tourism are all permanent effects that cannot be mitigated to an acceptable level.

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

It is requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

My husband's family are from and still live in Shawbost, Isle of Lewis. This is where he was brought up. He and his 3 brothers have had to leave the island because there is very little opportunity for quality employment, beyond subsistence crofting, tourism and offshore jobs.

My in-laws and their relatives are still resident in Shawbost and their grandchildren are in GME in Glasgow to ensure that the cultural link is not broken. We hope to move back one day if finances allow.

We are devastated at the lack of community engagement around the project. The communities are fragile enough and completely disregarded due to being small in number. No one who hasn't grown up there has any idea of the difficulty making a living and having a good quality of life there. There is some solace in the beauty of the place but this project will wreck that too. There is growing evidence that the Bass Rock off of

North Berwick will lose its entire bird population due to the East Coast wind farms. This needs to be studied in much greater depth before any other large scale farms are permitted. You can't say this is good for the environment and then slaughter the entire bird population! This project is not for any natural benefit and is purely driven by a profit motive.

Let's rape the natural resources, wildlife and beauty of Lewis for absolutely no short, medium or long term benefit of the community. Oh and while we're at it, let's take away the beauty that draws the essential economic tourist income while we're at it. And put even more pressure on the affordable housing shortage for local people.

There is nothing environmentally friendly about this scheme at all. Always follow the money. We absolutely oppose this scheme and it's scale.

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: 6A44457B

Member of the public 663

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 reveals significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environmental conditions, and strong cultural heritage. Concerns arise regarding the compatibility of the scale, proximity, and design of the proposal with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential basis for lawful determination. Important environmental data is absent, baseline information is both limited and inconsistent, and key proposal elements remain undefined. The flexible design framework employed hampers a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive or informed assessment of environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack robust evidential support.

Furthermore, the proposal presents clear and substantive conflicts with policy. It 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. The application does not adequately demonstrate adherence to national obligations to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory tests required for consent and hinder the competent authority's ability to deem the development acceptable from a policy perspective.

The unprecedented scale of this proposal poses significant concerns due to the large turbines being positioned in close proximity to the shoreline, raising issues related to landscape capacity, visual dominance, and environmental impact. In summary, the combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and evident policy non-compliance signifies that the application is incomplete and unable to 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 fundamentally flawed and fails to deliver a comprehensive, transparent, or reliable evaluation of the potential environmental impacts associated with the proposal. The introduction of a flexible Project Design Envelope, lacking a commitment to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This ambiguity hinders a consistent application of a worst-case scenario, thereby compromising the integrity of the assessment. As a result, the impacts detailed may not accurately represent the development that is ultimately realised, obstructing both public understanding and that of the competent authority regarding the true extent of environmental consequences.

Furthermore, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the premise that any environmental harm will be rectified at a later stage precludes a meaningful evaluation of the effectiveness of such measures or an assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally inappropriate and contradicts the core objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigations be clearly established before a determination is made.

There exist notable evidential deficiencies as well, encompassing gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, particularly when conclusions regarding negligible or non-significant effects are offered without solid supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that is incompatible with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This necessitates the precautionary principle's application, especially regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be established that impacts have been comprehensively assessed or that appropriate safeguards are present.

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

ASSESSMENT OF ALTERNATIVES

The inadequacy of the alternatives assessment is significant, as it does not adhere to the statutory requirements of the Environmental Impact Assessment regime. The

application offers a narrative of the project's evolution rather than a structured, reasoned comparison of realistic alternatives based on their environmental effects. This method fails to show that less harmful options have been properly identified, assessed, and selected in favour of more damaging solutions.

The lack of transparent and evidence-based comparisons of alternative offshore locations, development scales, and design configurations is particularly concerning. The application does not convincingly demonstrate that the developer has given serious consideration to locating turbines further offshore, where the visual, ecological, and coastal impacts would likely be less severe. The West Lewis coastline is sensitive, and the crucial role of proximity to shore in determining impact highlights the critical need for this analysis; without it, there is no basis for concluding that the proposed siting represents the least damaging option.

This issue extends to the cable routing and landfall assessment, as there is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The absence of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been implemented, with an overreliance on post-design mitigation measures. Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing.

This failure to adhere to the established mitigation hierarchy hinders the competent authority's ability to ascertain whether less harmful and more appropriate alternatives exist. Without a comprehensive alternatives assessment, it cannot be concluded that the proposal is a sustainable or policy-compliant solution. From a policy standpoint, this deficiency compromises compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment represents a material omission that reinforces the conclusion that the application has not been adequately assessed and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is inadequate, failing to provide a complete and reliable understanding of ecological receptors in this sensitive marine area. The methodologies employed do not effectively capture crucial aspects such as species presence, behaviour, and habitat use, leading to an incomplete baseline dataset. This deficiency undermines the foundation necessary for evaluating potential impacts.

A notable oversight is the assessment of otters, which are classified as a European Protected Species. The application neglects to properly acknowledge their active use of coastal regions for foraging and movement. Consequently, the assessment lacks consideration of their core foraging range and behavioural patterns, leaving the potential impacts of construction disturbance, noise, and increased human activity

unassessed. This failure to evaluate these factors calls into question any conclusions drawn regarding the absence of significant effects on otters.

The evaluation of basking sharks also presents significant deficiencies, as the reliance on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions. This method likely underestimates the presence of these sharks, especially when compared to established land-based observations that demonstrate their frequent utilisation of these waters. The lack of incorporation of such data contributes to an incomplete baseline, further undermining the reliability of the conclusions presented.

As a result of these methodological shortcomings, the claims of negligible or non-significant effects are based more on assumptions than on solid evidence. Additionally, the insufficiency of baseline data hampers the ability to assess cumulative and indirect impacts effectively, which encompass seasonal variations and broader ecosystem interactions. This situation generates uncertainty about the actual risks posed to marine species and their habitats.

Regulatory compliance issues arise as the application does not satisfy the requirements established by the Environmental Impact Assessment framework and the National Planning Framework 4, since protected species have not been properly identified or assessed. The uncertainty introduced prevents the exclusion of adverse effects beyond a reasonable scientific doubt, activating the precautionary principle. Therefore, consent for the proposed application cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment presented in the application is marred by significant methodological weaknesses and internal inconsistencies, resulting in an unreliable evaluation of impacts. Notably, the application does not adequately demonstrate that internationally important seabird populations, many of which are already in decline, will remain unaffected by the proposed development. The west coast of the Isle of Lewis is a critical habitat for these species, yet the assessment fails to provide sufficient evidence that their foraging areas and migratory pathways will be preserved.

Moreover, a fundamental contradiction is evident within the application. While the developer asserts that there will be no significant adverse effects, they simultaneously advance a Habitats Regulations derogation case, which is only required in scenarios where significant harm is anticipated. This inconsistency raises serious doubts about the validity of the conclusions drawn in the assessment, indicating that they are not substantiated by the underlying evidence.

The assessment also does not adequately address the importance of key feeding grounds associated with protected sites such as the Lewis Peatlands and St Kilda. The reliance on modelling approaches introduces substantial uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars, and there is a likelihood that mortality rates are underestimated. This concern is exacerbated by incomplete baseline data and a lack of understanding of species' behavioural responses.

The siting of turbines within a recognised migratory corridor adds another layer of risk, creating a potential barrier to primary flight paths used by species migrating between the United Kingdom and Iceland. The long-term consequences of sustained mortality within this corridor, particularly for species with small global populations, have not been adequately assessed.

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

Furthermore, the identified deficiencies reflect a failure to comply with National Planning Framework 4, particularly concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not face adverse effects places this proposal in direct opposition to national policy. Collectively, these factors culminate in the conclusion that the assessment does not meet the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development presents significant shortcomings in its assessment of cultural heritage and community identity, particularly regarding the West Lewis coastline, which should be viewed as a living cultural landscape intertwined with environment, language, tradition, and community. The application adopts a narrow perspective, treating heritage as disconnected, static elements rather than recognising their dynamic social, cultural, and spiritual roles in the community.

A notable oversight is the categorisation of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active burial and spiritual spaces, yet they are considered static features in the assessment. This approach neglects their ongoing use, significance, and the implications of development on their surroundings. Consequently, this mischaracterisation leads to an inadequate evaluation of cultural impacts and dismisses their importance in community life.

Furthermore, the assessment lacks attention to intangible cultural heritage, including the Gaelic language, local traditions, and the enduring connection between the

community and the coastal environment. These aspects are vital to the area's identity, yet they are wholly absent from the evaluation, resulting in a substantial omission. The absence of these considerations hinders a comprehensive understanding of the cultural impact associated with the development.

Concerns also arise regarding community rights and participation. The Gaelic-speaking community, which embodies characteristics of an Indigenous People, has not been afforded a 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 community participation in matters that affect cultural and environmental interests.

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

These deficiencies also conflict with policy frameworks, particularly National Planning Framework 4, which emphasises the protection of historic assets and places. The failure to consider both tangible and intangible heritage and to acknowledge ongoing cultural practices signifies a clear deviation from policy requirements.

Collectively, the neglect to assess living heritage, intangible cultural values, community rights, and compliance with statutory obligations results in a substantial evidential gap. The cultural impacts of the proposed development have not been adequately addressed, and the application does not furnish a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding social impacts, health, and wellbeing is a critical issue that undermines the evaluation process. A Social Impact Assessment was commissioned by the developer and involved focus groups with local residents; however, the full report has not been made public. This significant gap in evidence inhibits both public understanding and the competent authority's ability to grasp the full extent of the social risks identified through the developer's own findings.

Evidence suggests that local residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These effects stem from direct engagement with the community and are therefore based on actual experiences rather than speculation. Yet, the omission of the full assessment stymies proper scrutiny of these findings and hampers the assessment of their implications within the decision-making framework.

Additionally, there are indications that the proposal is viewed as a threat to community identity and cohesion, with the term "cultural loss" featured in the developer's findings.

Nonetheless, these impacts have not been adequately included in the main application or given the necessary consideration. By withholding the complete Social Impact Assessment, the true human and social costs of the development remain obscured.

This lack of transparency has repercussions for the Environmental Impact Assessment process. It is vital to fully understand the social, economic, and health impacts associated with developments of this magnitude, especially when community character and functionality are at stake. Without the complete dataset, the application does not present a comprehensive evidential basis to properly weigh the benefits against the potential harms.

From a policy standpoint, the application is insufficient in demonstrating alignment with National Planning Framework 4 concerning health and wellbeing. Development initiatives are required to foster positive health outcomes and mitigate harm; however, the existing evidence reveals adverse effects that have not been fully disclosed. Without the complete assessment, it is impossible to ascertain compliance with these policy requirements.

The procedural ramifications 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 substantial omission in the application, failing to meet the evidential standards established by the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the full Social Impact Assessment, coupled with evidence of current adverse impacts, results in an assessment that is both incomplete and unreliable. This circumstance prevents a lawful determination and reinforces the assertion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts associated with the proposal is severely lacking and does not sufficiently capture the scale of change or the sensitivity of the West Lewis coastline. This area is characterised by its open Atlantic horizon, undeveloped nature, and significant remoteness. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence that fundamentally alters this character, leading to a permanent and irreversible transformation of the landscape.

The application fails to adequately reflect the magnitude of visual change anticipated. Given their size and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. Such an impact would directly affect visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment does not convey the extent of this impact or its significance within the context of such a sensitive landscape.

There are also significant methodological issues concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints might not

adequately represent the most sensitive receptors or worst-case scenarios, particularly in relation to key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact has been understated, which undermines the reliability of the assessment.

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

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

From a policy standpoint, the proposal conflicts with National Planning Framework 4 concerning the safeguarding of natural places and historic assets. The anticipated scale of change is incompatible with the obligation to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further undermines any claims of compliance with policy.

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

Collectively, these deficiencies prevent a reliable evaluation of the proposal and reinforce the conclusion that it is incompatible with the protection of this landscape. The assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage.

CONSTRUCTION AND POLLUTION RISKS

The deficiencies in the assessment of construction and pollution risks are significant, rendering it materially incomplete and lacking the necessary detail to evaluate likely environmental effects. The proposal entails substantial seabed preparation and installation works within a high-energy Atlantic environment, yet it lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be formulated post-consent, thus precluding any meaningful assessment of their adequacy or effectiveness.

The reliance on unspecified future measures raises considerable concerns, especially given the sensitivity of the receiving environment. The West Lewis coastline is home to

clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not provide adequate detail on preventative, control, or monitoring measures.

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

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent stage, the application obstructs the evaluation of whether sufficient safeguards are in place to address pollution events. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures prior to decision-making.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the stipulations of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures are assessed prior to granting consent, 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 lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively result in an assessment that is materially deficient. These shortcomings impede a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

An assessment of fisheries and marine life is critically lacking, as it does not provide a thorough evaluation of ecological or socio-economic impacts. The waters off the West Lewis coast sustain both a diverse marine ecosystem and an active fishing industry. Yet, the application fails to illustrate how these vital uses and habitats can be safeguarded or sustained without substantial disruption. There is a fundamental issue with the assumption that fishing activity can be displaced without consequences. The

application offers no evidence that alternative fishing grounds are available, accessible, or capable of withstanding additional pressure. This omission is crucial, as displacing fishing could lead to overfishing in other areas and might result in broader economic repercussions for the local fleet. A clear and evidence-based assessment is necessary to comprehend the impacts on fisheries and livelihoods properly.

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents significant concerns regarding the incomplete assessment of onshore infrastructure and its associated impacts, which are crucial for understanding the entirety of this integrated project. The offshore turbines and the onshore works are inherently connected, yet the current evaluation treats them as separate entities. This fragmented assessment obscures the true extent of environmental and socio-economic effects.

Onshore works encompass cabling that crosses protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, which is ecologically sensitive and serves as a significant carbon store. The lack of a comprehensive assessment of these impacts fails to provide a full understanding of the project's overall environmental footprint.

The application's decision to exclude or defer the assessment of onshore impacts

inhibits a thorough evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project components must be examined collectively. However, the disjointed consideration of offshore and onshore aspects means that the combined impacts on peatlands, habitats, and local communities remain inadequately understood.

Additionally, there are substantial risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not convincingly demonstrate that impacts on these habitats have been comprehensively evaluated, nor does it outline appropriate avoidance measures, leading to significant gaps in biodiversity protection.

Concerns are also raised regarding carbon balance due to the disturbance of peatland, which releases stored carbon and potentially incurs a carbon debt. This situation stands in opposition to the goals of renewable energy development. The application fails to address this matter adequately, nor does it show that the overall carbon balance is beneficial.

Furthermore, the routing of infrastructure through active croft land introduces possible conflicts with existing land use and legal rights. There is no evidence that the requisite consents or processes have been initiated, raising doubts about the project's deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project holistically, alongside the inability to demonstrate protection for peatlands, habitats, and land use interests, contradicts the National Marine Plan and National Planning Framework 4. The lack of evidence regarding the avoidance or mitigation of impacts further undermines the application.

In summary, the disconnection of project components, the absence of a thorough assessment, and insufficient evidence related to environmental and land use impacts render this section of the application incomplete and unreliable, ultimately hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in defining the area's environmental quality, cultural identity, and tourism potential. However, the Environmental Impact Assessment fails to address the significant implications of the proposed permanent red aviation lighting, which would create a persistent and intrusive "wall of light" effect across the western horizon, drastically altering the night-time environment.

Moreover, the application does not evaluate how this lighting would impact visual amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly concerning given the growing significance of dark skies for the region's identity and the emerging sector of astro-tourism. The lack of consideration for

these effects reveals a substantial gap in the overall assessment of the landscape and environment.

A more critical issue arises with the absence of an evaluation concerning the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are acutely sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application does not incorporate a lighting impact assessment or any study of phototaxis, neglecting to examine how aviation lighting may affect these species or contribute to higher mortality rates.

Furthermore, reliance on daytime survey data in the ornithological assessment fails to account for nocturnal activity and related risks. For instance, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting; however, this risk remains unassessed. The lack of site-specific night-time data leaves a significant gap in the understanding of ecological impacts.

Without an assessment of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites would face adverse consequences. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt cannot be achieved, thereby invoking the precautionary principle and obstructing a lawful decision.

From a policy standpoint, this omission contravenes National Planning Framework 4 regarding the safeguarding 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 essential component of the overall ecosystem.

In summary, the lack of any assessment concerning dark skies and nocturnal wildlife constitutes a significant evidential deficiency. The failure to provide baseline data, impact modelling, and species-specific analysis renders the application incomplete and inadequate for supporting a lawful determination.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm signifies a profound failure to meet the criteria for sustainable development in light of statutory obligations, national policy, and evidential standards. It revisits the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. This current proposal is now submitted under a more robust policy framework that places heightened emphasis on biodiversity, peatland conservation, landscape integrity, and community wellbeing.

The submission lacks a comprehensive and reliable evidential foundation necessary for a proper determination. Notable gaps exist in baseline data, the continued reliance on an unspecified design envelope, unclarified mitigation measures, and a failure to address significant impact pathways, including nocturnal wildlife, complete onshore

infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a clear understanding of the likely significant effects or any residual impacts.

Procedurally, there are evident failures present. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to present the complete Social Impact Assessment represents a critical omission. Such deficiencies hinder the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

There remains a degree of uncertainty regarding environmental risks that could be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in places. The evidential standard required to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, thus engaging the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

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

Taken collectively, the application is both procedurally and substantively inadequate for determination. The extent of informational deficiencies, along with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority is compelled to either refuse consent based on these grounds or invoke appropriate regulatory measures to mandate the submission of the required information.

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

Additional Comments

I personally object in the strongest terms to this siting of a permanent, disruptive, impactful and dangerous installation off the coast of Lewis, and Harris.

That such a massive installation should be built here for the benefit of human beings at

such a huge distance of remove from the site, without taking into consideration the impact on local humans and the vastly larger numbers of non human residents is an approach that needs to stop. Now. Further construction and damage of this nature is something our race cannot afford to continue to be doing.

For far too long humans have been living as if the planet were nothing more than resources for our wellbeing and benefit. The results of such an imbalanced approach are everywhere to be seen. Sourcing power from wind will become the next disaster after fossil fuel extraction. No more.

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: DA239BF6

Member of the public 664

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

Dear Sir/Madam

This letter represents 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 concerns stem from a review of the Environmental Impact Assessment Report, which reveals significant deficiencies in planning, environmental protection, cultural preservation, and procedural integrity. The proposed site is located off the west side of the Isle of Lewis, an area recognised for its stunning Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The proposal's scale and design, particularly its proximity to the shore, raise urgent questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

A critical issue with the application is the lack of a solid evidential basis for any lawful determination. Important environmental data has been omitted, baseline information is both limited and inconsistent, and vital aspects of the proposal remain undefined. This flexible design framework complicates the assessment of potential significant effects, while the unspecified mitigation measures leave their effectiveness unexamined. Consequently, the supporting documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Moreover, there are notable policy inconsistencies. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate that it can satisfy national requirements to protect biodiversity, climate interests, and environmental integrity. These inconsistencies directly affect the statutory tests for consent and compromise the ability of the competent authority to assess the development's acceptability in terms of policy.

The unprecedented scale of this project, featuring large turbines situated near the shoreline, generates significant worries about landscape capacity, visual dominance, and overall environmental impact. When considering the combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance, it becomes evident that the application is incomplete and unfit for lawful determination. In light of these serious concerns, the precautionary principle must be invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is significantly flawed, failing to deliver a comprehensive and trustworthy understanding of ecological receptors within the West Lewis coastal environment. This marine system is particularly sensitive and biologically active, yet the baseline data remains incomplete. The methodologies employed do not sufficiently capture essential aspects such as species presence, behaviour, and habitat use. Consequently, the assessment does not establish a solid evidential foundation for evaluating potential impacts.

One critical gap is the assessment related to otters, which are classified as a European Protected Species. The application does not adequately recognise or evaluate their active utilisation of coastal areas for foraging and movement. The oversight concerning their core foraging range and behavioural patterns leads to an insufficient assessment of the potential effects stemming from construction disturbance, noise, and increased activity. This deficiency undermines any conclusions drawn regarding the absence of significant effects on otters.

Additional shortcomings are evident in the evaluation of basking sharks. The dependence on aerial surveys introduces a significant detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The failure to incorporate or properly consider relevant data results in an incomplete baseline, further compromising the reliability of the conclusions presented.

These methodological weaknesses culminate in conclusions of negligible or non-significant effects that are based more on assumptions than on robust evidence. The lack of adequate baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This creates uncertainty surrounding the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, given that protected species have not been properly identified or evaluated. The uncertainty introduced by these deficiencies prevents 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 deficiencies inhibit a thorough evaluation of impacts on marine ecology and protected species, leading to the overarching conclusion that the application is devoid of a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposal is fundamentally flawed, exhibiting substantial gaps in evidence and inconsistencies that undermine its conclusions. Key foraging areas and

migratory pathways, particularly along the west coast of the Isle of Lewis, support internationally important seabird populations, many of which are already experiencing declines. However, the application fails to demonstrate, to the necessary evidential standard, that these species will not be adversely affected by the development. The implications of displacement, collision risk, and habitat loss have not been robustly evaluated.

There exists a significant contradiction within the application. The developer concludes that there are no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence presented.

Moreover, the assessment does not sufficiently demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is inadequately considered, and reliance on modelling approaches introduces uncertainty, especially for species in severe decline like Kittiwakes and Fulmars. The methodologies utilised are likely to underestimate mortality rates, particularly given the incomplete baseline data and a lack of comprehensive understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor presents additional significant risks, effectively creating a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not thoroughly assess the long-term implications of sustained mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application fails to meet the evidential threshold necessary to assert no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle, which precludes a lawful conclusion that would support consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage assessment related to the West Lewis coastline is fundamentally inadequate. It fails to recognise the area as a living cultural landscape, where environment, language, tradition, and community are deeply interconnected. Instead of acknowledging the ongoing social, cultural, and spiritual functions of heritage, the application adopts a reductive approach, treating it as a collection of isolated and static assets.

Significant deficiencies are evident in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites are active places of burial and spiritual practice. However, the assessment categorises them merely as static features. This oversight disregards their continued use and the impact of development on their setting, leading to an incomplete evaluation of cultural effects and ignoring their importance in community life.

The assessment also fails to consider intangible cultural heritage, including the Gaelic language, traditions, and the established relationship between the community and the coastal environment. These elements are vital to the area's identity but are completely overlooked in the assessment, marking a significant omission. Without these considerations, the true cultural impact of the development cannot be understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity, with characteristics recognised as those of an Indigenous People. Yet, the application has not undertaken any process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's legitimacy and fails to uphold established participation principles in decisions affecting cultural and environmental interests.

Another critical failure is the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents a lawful determination.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application for large-scale turbines near the West Lewis coastline presents a range of significant deficiencies in its assessment of seascape, landscape, and visual impacts. This area is characterised by an open Atlantic horizon, an undeveloped nature, and a strong sense of remoteness. The introduction of such industrial elements in close proximity to the shoreline would result in a dominant presence that fundamentally transforms this character, leading to irreversible changes to the landscape.

A key issue is the inadequate representation of the visual impact of these turbines. Their scale and proximity threaten to dominate views from various residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and compromising the essential qualities of naturalness and remoteness. The current assessment does not convey the true extent or significance of this impact within the context of a sensitive landscape.

Moreover, there are serious methodological concerns regarding the choice and presentation of visual viewpoints. The evidence indicates that these viewpoints may not fully account for the most sensitive receptors or depict worst-case scenarios, particularly concerning vital cultural heritage sites and high-value landscapes. This oversight raises doubts about the accuracy of the stated visual impact and undermines the assessment's overall reliability.

Additionally, the application neglects to evaluate the interconnections between landscape, seascape, and cultural heritage comprehensively. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are not viewed in the context of their wider landscape setting and visual relationships with the Atlantic horizon. Instead, they are treated as isolated entities, leading to an incomplete assessment of the impacts on their setting and cultural significance.

The proposed industrialisation would sever the connections that define these heritage assets, fundamentally altering the context in which they are experienced and disrupting their relationship with the natural horizon. This not only represents a visual impact but also indicates broader cultural and spatial harm that remains unassessed in the application.

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

Ultimately, the identified impacts are such that they cannot be effectively mitigated. The scale, height, and proximity of the turbines would render their presence overwhelming and unavoidable. Thus, the changes introduced are fundamental and permanent, incapable of being reduced to acceptable levels through any mitigation measures.

In summary, the overall assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and firmly support the conclusion that the proposal is incompatible with the necessary protections for this landscape.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry, which the application does not sufficiently protect or maintain from significant disruption. The assessment of fisheries and marine life lacks a robust evaluation of the ecological and socio-economic impacts involved. A critical concern lies in the application's assumption that fishing activities can be displaced without consequence. There is no evidence provided to show that alternative fishing grounds are available, accessible, or capable of sustaining the additional pressure that such displacement would entail. This lack of information is crucial, as it poses a risk of overfishing in other areas, potentially leading to wider economic implications for the local fishing fleet.

Moreover, the proposal raises substantial risks to marine species, especially due to underwater noise generated during construction activities. High-energy hammer piling is anticipated to create disturbances over extensive distances, adversely impacting species such as dolphins. The predicted disruption to a significant portion of the local bottlenose dolphin population generates serious concerns, yet these effects are downplayed in the application without adequate supporting evidence.

The application contains a notable inconsistency where the necessity of licences to permit harm to European Protected Species is acknowledged, while simultaneously characterising impacts as negligible. This contradiction undermines the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, particularly where harm is foreseen that requires legal authorisation.

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

From a policy perspective, the application fails to demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby preventing any conclusion that the proposal constitutes sustainable development.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is notable for its exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism value. The Environmental Impact Assessment fails to address the effects of proposed permanent red aviation lighting that would be visible over long distances. This lighting would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

There is no analysis of how this lighting would affect visual amenity, landscape character, or the experiences of residents and visitors. This lack of assessment is significant given the vital role that dark skies play in the region's identity and in emerging tourism sectors like astro-tourism. The failure to consider these impacts highlights a clear gap in the overall landscape and environmental assessment.

More critically, the proposal does not evaluate the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can lead to disorientation and a heightened risk of collision. The application lacks a lighting impact assessment or phototaxis study, thus failing to examine the potential effects of aviation lighting on these species or the possibility of increased mortality.

The reliance on daytime survey data in the ornithological assessment further exacerbates this issue, as it does not account for nocturnal activity or the risks associated with it. Other species, such as Kittiwakes, which may forage or migrate at night, also face disorientation risks due to artificial lighting, yet this has not been evaluated. Without site-specific night-time data, a critical gap in understanding ecological impacts remains.

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

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

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

SUMMARY

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

There are significant gaps in the baseline data provided, reliance on an undefined design envelope, unspecified mitigation measures, and crucial omissions regarding impact pathways, including those affecting nocturnal wildlife, the full extent of onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of the likely significant effects or residual impacts.

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

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

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

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

In summary, the application is unfit for determination both procedurally and substantively. The extensive information deficiencies, combined with policy inconsistencies and unresolved environmental risks, obstruct a lawful and evidence-

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

Additional Comments

I object to the proposed wind farm off the Western Isles because it could harm local wildlife, especially seabirds, and disrupt fishing activities that the community relies on. It may also damage the natural scenery, which is important for tourism and the local economy.

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: FBB81F99

Member of the public 665

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. The objection arises from an assessment of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies in planning, environmental considerations, cultural matters, and procedural aspects. The project is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, near-pristine environment, and vibrant cultural identity. Concerns regarding the proposal's scale, proximity to the shore, and overall design raise serious questions about its adherence to statutory obligations, national policy frameworks, and sustainable development principles.

The application lacks a robust evidential foundation necessary for a lawful decision. There are critical gaps in environmental data, with baseline information proving to be both limited and inconsistent. Furthermore, key elements of the proposal remain ambiguous. The utilisation of a flexible design framework obscures potential significant effects, and the reliance on unspecified mitigation measures hinders any assessment of their potential efficacy. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community repercussions, with assertions of negligible or non-significant impacts lacking solid evidence.

Policy discrepancies are evident and substantial. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment protocols, or National Planning Framework 4, particularly concerning biodiversity, natural areas, cultural heritage, and public health. It does not convincingly demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests necessary for consent, compromising the ability of the competent authority to determine the proposal's acceptability within policy parameters.

The unprecedented scale of the project, with large turbines situated in close proximity to the coastline, raises substantial issues related to landscape capacity, visual impact, and overall environmental implications. Collectively, the deficiencies in information, reliance on undefined mitigation strategies, evidential shortcomings, and evident policy violations indicate that the application is incomplete and cannot substantiate a lawful decision. Under these circumstances, 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 comprehensive, transparent, or trustworthy account of the potential environmental effects associated with the proposal. The incorporation of a flexible Project Design Envelope, which does not commit to particular turbine dimensions, layouts, or configurations, creates substantial uncertainty and hinders the consistent application of a worst-case scenario analysis. This diminishes the reliability of the assessment, making it difficult for both the public and the competent authority to grasp the true environmental impacts that may arise from the development.

The application also places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Therefore, the request for consent is predicated on the assumption that environmental harm will be addressed at a later stage. This approach obstructs any meaningful evaluation of the potential effectiveness of such measures or the assessment of residual impacts. Deferring key information to post-consent stages is not procedurally acceptable and contradicts the fundamental aim of the Environmental Impact Assessment process, which mandates that likely significant effects and mitigation strategies must be clearly established before a determination can be made.

Further evidential deficiencies are apparent, including significant gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. Such deficiencies create uncertainty surrounding the magnitude and significance of impacts, particularly in instances where conclusions of negligible or non-significant effects are asserted without robust supporting data. The lack of adequate information compromises the ability to understand cumulative and worst-case impacts and introduces scientific uncertainties that are not aligned with statutory obligations.

Consequently, the application fails to satisfy the evidential threshold stipulated under the Habitats Regulations, which is necessary to dismiss adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not illustrate adherence to National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it is unable to demonstrate that impacts have been fully evaluated or that appropriate safeguards are established.

In summary, the reliance on an ill-defined design envelope, the absence of specified mitigation measures, and the gaps in baseline data collectively render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings impede a lawful and thorough assessment of environmental effects and indicate that the competent authority cannot justifiably determine the application based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application lacks a structured and evidence-based assessment of alternatives, which is essential under the Environmental Impact Assessment regime. Instead of presenting a reasoned comparison of realistic alternatives concerning their environmental effects, it merely recounts the project's development. This narrative approach fails to demonstrate that less harmful options have been identified and properly evaluated in favour of more damaging ones.

Furthermore, the application does not include a transparent comparison of different offshore locations, development scales, or design configurations. Notably, it does not indicate that the developer has thoroughly explored the option of positioning turbines further offshore, where potential impacts on visual aesthetics, ecology, and the coast could be lessened. The West Lewis coastline's sensitivity and the significant role of proximity to shore in assessing impact mean that the absence of such an analysis undermines any assertion that the proposed siting is the least damaging.

The shortcomings also apply to cable routing and the assessment of landfall, as there is inadequate evidence showing that alternative routes have been investigated to minimise impacts on sensitive areas. This includes regions of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis suggest that mitigation measures by design have not been utilised, relying instead on mitigation strategies after the design phase.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure planning. This oversight signifies a failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to ascertain whether less harmful alternatives are available. Without a thorough assessment of alternatives, it is impossible to conclude that the proposal is sustainable or aligns with policy requirements.

From a policy standpoint, this deficiency raises concerns regarding compliance with the National Planning Framework 4, especially with respect to safeguarding natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that supports the overarching conclusion that the application has not been sufficiently evaluated and cannot receive lawful approval.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development raises significant concerns due to a deficient assessment of marine ecology and protected species, particularly within the sensitive and biologically rich West Lewis coastal environment. The methodologies employed fail to present a comprehensive understanding of ecological receptors, resulting in incomplete baseline data that inadequately captures species presence, behaviour, and habitat use. This deficiency undermines the evidential basis required for evaluating potential impacts.

Among the critical shortcomings is the assessment of otters, a European Protected Species. The application does not fully recognise or assess their active use of coastal areas for foraging and movement. This oversight regarding their core foraging range and behaviour means that the potential impacts of construction disturbances, noise, and increased activity have not been properly evaluated, thus compromising any conclusions drawn about the absence of significant effects on this species.

Additionally, the evaluation of basking sharks reveals further weaknesses, as reliance on aerial surveys introduces significant detection bias, particularly under Atlantic conditions. This approach is likely to underestimate the presence of these animals, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to adequately incorporate or consider such data results in an incomplete understanding of the baseline, diminishing the reliability of the conclusions reached.

These methodological inadequacies lead to the conclusion that claims of negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of sufficient baseline data hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. Consequently, uncertainty prevails regarding the actual risks posed to marine species and habitats.

From a regulatory viewpoint, the application falls short of meeting the standards set by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. This introduced uncertainty hinders the ability to exclude adverse effects beyond reasonable scientific doubt and necessitates the application of the precautionary principle. Under these circumstances, granting consent would not be legally justified.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application is fundamentally flawed from a regulatory standpoint, failing to satisfy the evidential threshold necessary to ascertain that there will be no adverse effects on the integrity of protected sites. It contains significant gaps in evidence and internal inconsistencies, which call into question the reliability of the conclusions drawn. The assessment does not adequately demonstrate that internationally important seabird populations, particularly those associated with protected sites such as the Lewis Peatlands and St Kilda, will remain unaffected.

Additionally, the assessment overlooks the critical importance of key foraging areas and migratory pathways located within the development site. This is particularly concerning given that the west coast of the Isle of Lewis supports seabird populations

that are already in decline. The methodologies employed are prone to underestimating potential mortality rates, especially in cases where baseline data is incomplete and the behavioural responses of species, such as Kittiwakes and Fulmars, are not fully understood.

A significant contradiction exists within the application itself, as the developer asserts that there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which suggests that harm is anticipated. This inconsistency further undermines the credibility of the assessment.

Moreover, the siting of turbines within a recognised migratory corridor poses a considerable risk by effectively acting as 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, as well as the potential impacts on species with relatively small global populations, have not been sufficiently evaluated.

These deficiencies, including contradictory conclusions and limitations in data and modelling, ultimately mean that the assessment does not achieve the standard of beyond reasonable scientific doubt. This engages the precautionary principle and renders a lawful conclusion in support of consent unattainable. Furthermore, the inability to demonstrate that internationally important seabird populations will not be adversely affected conflicts with the requirements of National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets.

In conclusion, the assessment is unreliable due to its methodological weaknesses, internal inconsistencies, and insufficient evidence, which collectively hinder a comprehensive evaluation of the potential impacts. As such, the application does not meet the statutory requirements necessary for proper determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning cultural heritage and community identity is fundamentally deficient, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interlinked. The application adopts an overly simplistic approach, viewing heritage merely as a collection of static assets instead of appreciating their ongoing social, cultural, and spiritual significance to the community.

Particularly concerning is the inadequate treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practices; however, the assessment labels them as static features, neglecting their continued use and meaning, as well as the implications of development on their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural impacts and overlooks their importance in community life.

Additionally, the application neglects to address intangible cultural heritage, including the Gaelic language, local traditions, and the enduring relationship between the

community and the coastal environment. These elements are pivotal to the area's identity yet are conspicuously absent from the assessment, representing a significant oversight. The lack of consideration for these factors hinders a comprehensive understanding of the cultural impact of the development.

Concerns also arise regarding the rights and engagement of the community. The Gaelic-speaking population embodies a distinct cultural identity recognised as characteristic of an Indigenous People; however, there has been no implementation of a process for Free, Prior and Informed Consent. The absence of meaningful engagement undermines the credibility of the assessment and fails to adhere to established principles of participation in decisions affecting cultural and environmental interests.

Moreover, a critical procedural shortcoming is the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment inhibits the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission, in itself, prevents a lawful determination.

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

In summary, the combined failure to assess living heritage, intangible cultural values, community rights, and statutory obligations creates a significant evidential gap. The cultural implications of the development remain inadequately assessed, rendering the application insufficient for a proper evaluation of its true cultural cost.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts on the seascape, landscape, and cultural heritage is inadequate and does not accurately portray the scale of change or the sensitivity of the environment. The coastline of West Lewis, characterised by its expansive Atlantic horizon and undeveloped landscape, embodies a profound sense of remoteness. The proposed installation of large turbines near the shoreline would impose a dominant industrial presence that would irreversibly alter this character, resulting in a permanent transformation of the landscape.

Moreover, the application does not sufficiently convey the extent of this visual change. The size and closeness of the turbines would overwhelm views from residential areas, historic sites, and popular coastal locations, thus diminishing visual amenity and compromising the inherent qualities of naturalness and remoteness. The assessment inadequately reflects this impact and overlooks its significance within such a delicate landscape.

Concerns also arise regarding the selection of visual viewpoints, which may not fully

encompass the most sensitive receptors or worst-case scenarios, especially regarding important cultural heritage sites and high-value landscapes. This suggests a potential understatement of the visual impact, calling into question the reliability of the assessment itself.

Additionally, there is a lack of analysis concerning the interconnectedness of the landscape, seascape, and cultural heritage. Heritage sites like the Calanais Standing Stones and other Scheduled Monuments are integral to the wider landscape, linked by visual and spatial relationships to the Atlantic horizon. Treating these sites as isolated entities disregards their interdependence, leading to an incomplete assessment of impacts on their setting and cultural importance.

The proposed industrialisation of the seascape threatens to sever these relationships, altering how heritage assets are perceived and disrupting their connection to the natural horizon. This results in not just a visual impact, but a deeper cultural and spatial harm that the application fails to adequately consider.

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

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

In summary, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a trustworthy evaluation, reinforcing the conclusion that the proposal is fundamentally incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

In addition, there is considerable uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The absence of robust modelling and clearly defined management strategies prevents a

determination of the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to marine species and habitats that have already been identified as sensitive within the broader assessment.

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

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

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

FISHERIES AND MARINE LIFE

The assessment of the application related to fisheries and marine life is inadequate and fails to provide a thorough evaluation of the ecological and socio-economic impacts involved. The waters off the West Lewis coast are home to a rich marine ecosystem and support an active fishing industry, yet the application does not adequately prove that these habitats and uses can be protected or maintained without substantial disruption.

A significant concern is the assumption that fishing activities can be displaced without repercussions. The application lacks evidence showing that alternative fishing grounds are available, accessible, or capable of absorbing additional pressure. This gap in information is crucial, as displacement may lead to overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a solid, evidence-based assessment, it is impossible to fully grasp the impacts on fisheries and the livelihoods dependent on them.

The proposal also poses considerable risks to marine species, particularly due to underwater noise generated during construction. High-energy hammer piling for an extended duration is expected to disturb marine life over vast areas, affecting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises alarming issues, yet the application minimizes the importance of these impacts without sufficient evidence to back this claim.

There exists a notable inconsistency in the application, acknowledging the necessity of

licenses to allow harm to European Protected Species while simultaneously describing these impacts as negligible. This contradiction weakens the assessment's credibility and raises concerns regarding adherence to the Habitats Regulations, especially where harm may be anticipated to a level that requires legal authorisation.

The assessment also neglects to address cumulative impacts resulting from various pressures, such as habitat disturbance, noise, and fishing activity displacement. Without a detailed 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 National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, hindering any conclusion that the proposal aligns with sustainable development principles.

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and inconsistencies within the application render the assessment incomplete and unreliable. These issues prevent a thorough evaluation of the implications for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application lacks a comprehensive assessment of the onshore infrastructure, leading to an incomplete understanding of its environmental and socio-economic impacts. The offshore turbines and the onshore works are fundamentally connected, yet they are evaluated separately, resulting in a fragmented analysis that obscures the overall scale of the project's effects.

Onshore elements include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through delicate landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, which is a vital carbon store and ecologically sensitive area. By not fully assessing these impacts, the application fails to provide a clear picture of the project's environmental footprint.

Exclusion or deferral of the assessment of onshore impacts obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all parts of a project be considered collectively. However, by treating offshore and onshore elements as distinct, the project does not adequately address the combined effects on peatlands, habitats, and local communities.

There are also considerable risks to sensitive habitats, including machair systems and peatland environments, both of which are protected by policy. The application does not clearly demonstrate that the impacts on these habitats have been fully evaluated or that suitable avoidance measures are in place, creating a significant gap regarding biodiversity protection.

The project raises serious concerns about carbon balance. The disturbance of peatland releases stored carbon, which could lead to a carbon debt that undermines the goals of renewable energy initiatives. The application does not sufficiently tackle this concern or prove that the overall carbon balance remains positive.

Additionally, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights. There is no evidence in the application that necessary consents or processes have been initiated, leading to doubts about the project's deliverability and lawful execution.

From a policy standpoint, the failure to assess the project as a whole 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 lack of evidence showing that impacts can be avoided or mitigated further weakens the application.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development when evaluated against statutory duties, national policy, and evidential standards. It mirrors the key concerns that resulted in the 2008 rejection of the Lewis Wind Power proposal, where the extent of industrialisation was deemed unacceptable. Notably, this current application is submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and the wellbeing of communities.

The evidential foundation for the proposal is neither complete nor dependable. There are significant gaps in baseline data, an undefined design envelope is being utilised, and there is reliance on unspecified mitigation measures. Moreover, critical impact pathways, including those related to nocturnal wildlife, comprehensive onshore infrastructure, and effects on tourism, have been omitted. As a result, the Environmental Impact Assessment is inadequate, failing to provide a thorough understanding of potential significant effects or residual impacts.

Clear procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands (Scotland) Act 2018. Furthermore, the failure to provide 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, rendering the application unfit for determination.

The proposal contradicts the National Planning Framework 4 by failing to demonstrate adequate protection of biodiversity, natural places, and cultural heritage. It does not

show that the health and wellbeing impacts are acceptable, nor does it provide evidence of 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 properly evaluated, obscuring their effects on 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, inconsistent. 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 regarding the acceptability of impacts.

The proposal would lead to substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and impacts 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 scale of deficiencies in information, alongside policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. Therefore, the competent authority should refuse consent on these grounds or activate the relevant regulatory measures to obtain 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 island is generating enough electricity but are paying the highest cost in bills. We should be getting it free not welcoming more disruption.

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: 41B77D57

Member of the public 666

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 for marine licensing and Environmental Impact Assessment. The review of the Environmental Impact Assessment Report and accompanying documents reveals significant deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural heritage.

The documentation provided fails to offer adequate evidence for a lawful decision. There are critical gaps in environmental data, while the baseline information presented is limited and inconsistent. Essential components of the proposal remain undefined. The flexible design framework complicates the understanding of possible significant effects, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the information does not allow for a thorough understanding of the impacts on the environment, culture, or community, and claims regarding negligible or non-significant effects lack robust support.

The proposal presents clear and substantial conflicts with policy. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements for protecting biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests needed for consent and impair the competent authority's ability to conclude the development is acceptable under policy guidelines.

The scale of this proposal is unprecedented for the area, with large turbines planned to be positioned close to the shoreline, raising significant issues around landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, dependence on undefined mitigation strategies, 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 essential elements and does not offer a comprehensive, transparent, or dependable account of the likely environmental consequences of the proposal. The use of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates

considerable uncertainty. This uncertainty obstructs a consistent application of a worst-case scenario, undermining the integrity of the assessment and leading to a situation where the impacts outlined may not correspond to the actual development constructed. As a result, both the public and the competent authority are left without a true understanding of the potential environmental effects.

The application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that any environmental harm will be mitigated later prevents a thorough evaluation of the effectiveness of these measures and an assessment of any residual impacts. This deferral of critical information to post-consent phases is procedurally improper and conflicts with the core objectives of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation strategies be clearly established prior to any determination.

Further complicating the situation are substantial evidential deficiencies, such as gaps in baseline data, limitations within the methodology employed, and an over-reliance on assumptions rather than site-specific evidence. These issues result in uncertainty about the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are reached without adequate supporting data. The lack of sufficient information impedes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to comply with statutory requirements.

Consequently, the application does not meet the evidential standards stipulated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly with regard to protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, especially in terms of biodiversity protection and environmental integrity, as it cannot be established that impacts have been fully assessed or that appropriate safeguards are in place.

Overall, the combination of reliance on an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies hinder a lawful and rigorous assessment of environmental effects, leaving the competent authority ill-equipped to make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application lacks a thorough and structured evaluation of alternatives, which is crucial under the Environmental Impact Assessment regime. Instead of offering a reasoned comparison of viable alternatives based on their environmental impacts, it provides an incomplete narrative of the project's development. This narrative does not satisfactorily prove that less harmful options have been properly identified and assessed in preference to more damaging choices.

Moreover, there is a notable absence of transparent, evidence-based comparisons of alternative offshore sites, development scales, or design configurations. Specifically, the failure to demonstrate that the developer has seriously contemplated placing turbines further offshore, where potential visual, ecological, and coastal impacts may be reduced, is concerning. The sensitivity of the West Lewis coastline, along with the critical nature of proximity to shore in assessing impact, underscores the importance of this analysis. Without it, one cannot confidently assert that the proposed siting is the least damaging option available.

This inadequacy extends to the evaluation of cable routing and landfall, where the application does not provide sufficient evidence that alternative routes have been adequately explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant locations such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis suggest that mitigation by design has not been considered, with a reliance instead on post-design mitigation strategies.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This oversight indicates a failure to adhere to the established mitigation hierarchy, preventing the competent authority from ascertaining the existence of less harmful and more suitable alternatives. In the absence of a robust assessment of alternatives, one cannot conclude that the proposal is a sustainable or policy-compliant solution.

From a policy perspective, these shortcomings compromise adherence to National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community wellbeing. The failure to present a structured and comparative assessment constitutes a significant omission, further reinforcing the conclusion that the application has not been sufficiently evaluated to support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents significant deficiencies in the assessment of marine ecology and protected species, failing to deliver 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 provided baseline data remains incomplete. Moreover, the methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of various species. Consequently, the assessment lacks a sound evidential basis for evaluating potential impacts.

A critical gap exists regarding otters, which are classified as a European Protected Species. The application does not adequately acknowledge or evaluate their active use of coastal regions for foraging and movement. The omission of their core foraging range and behavioural patterns leads to an insufficient assessment of how construction disturbances, noise, and increased activity might affect them. This oversight undermines the conclusions drawn about the absence of significant effects on this

species.

The evaluation of basking sharks also reveals shortcomings, as it relies on aerial surveys that introduce a substantial detection bias, particularly under Atlantic conditions. This method is likely to result in an underestimation of their presence, especially when compared to established land-based observations that suggest these waters are frequently used by the species. Neglecting to incorporate or adequately consider such data contributes to an incomplete baseline, ultimately weakening the reliability of the conclusions made.

These methodological flaws imply that conclusions regarding negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of sufficient baseline data further hampers the ability to conduct a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This raises uncertainty about the true extent of risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements outlined by the Environmental Impact Assessment regime and National Planning Framework 4, as there has been an inadequate identification or assessment of protected species. This uncertainty prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Given these circumstances, granting consent would not be lawful.

In summary, the combined issues of incomplete baseline data, flawed methodologies, and unsupported conclusions lead to an assessment that is fundamentally unreliable. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment presented within the application is fundamentally flawed, characterised by significant evidence gaps and internal contradictions that fundamentally undermine its conclusions. A notable contradiction arises from the developer's assertion that there will be no significant adverse effects, even as they pursue a Habitats Regulations derogation case, which is only applicable when significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence provided.

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 adequately demonstrate, to the necessary evidential standard, that these species will remain unaffected. The siting of turbines within recognised migratory corridors creates a substantial risk, as it introduces a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. Furthermore, the assessment does

not thoroughly evaluate the long-term consequences of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

Moreover, the assessment lacks sufficient evidence to ensure that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will not be adversely affected. The significance of these feeding grounds is not fully acknowledged, and the reliance on modelling approaches adds uncertainty, particularly for species in severe decline such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially when baseline data is incomplete and behavioural responses are not fully understood.

From a regulatory standpoint, the application fails to meet the evidential threshold required to determine no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle and precludes a lawful conclusion in favour of consent.

The identified deficiencies also signify non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to convincingly demonstrate that internationally important seabird populations will not be adversely affected places the proposal directly at odds with national policy. Collectively, these weaknesses render the assessment unreliable and inhibit a thorough evaluation of impacts, ultimately leading to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally lacking and does not recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. This application employs a simplistic approach, viewing heritage merely as a collection of discrete, unchanging assets rather than acknowledging their ongoing social, cultural, and spiritual roles within the community.

One significant shortcoming is the treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites of burial and spiritual practice, yet the assessment regards them as static features, overlooking their continued significance and the potential impact of development on their context. This mischaracterisation leads to an incomplete understanding of cultural effects and neglects their importance in community life.

Additionally, the application does not consider intangible cultural heritage, such as the Gaelic language, traditions, and the longstanding relationship between the community and the coastal environment. These elements are vital to the area's identity but are completely omitted from the assessment, marking a considerable gap. Without addressing these factors, the cultural implications of the development cannot be

accurately evaluated.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinctive cultural identity that aligns with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. The lack of meaningful engagement diminishes the validity of the assessment and fails to adhere to established principles of participation in decisions impacting cultural and environmental concerns.

A critical procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is a legal requirement under the Islands (Scotland) Act 2018. In the absence of this assessment, the competent authority cannot meet its legal obligation to assess the social, cultural, and economic effects on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these inadequacies place the proposal at odds with National Planning Framework 4, especially concerning the protection of historic assets and sites. The failure to consider both tangible and intangible heritage, along with the disregard for living cultural practices, represents a clear violation of policy requirements.

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory responsibilities results in a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application fails to provide a solid foundation for understanding the true cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing related to the proposed development have not been adequately assessed, revealing a lack of transparency that is crucial for a lawful evaluation. Although the developer conducted a Social Impact Assessment which involved focus groups with local residents, the full report remains unpublished. This absence creates a significant evidential gap that obstructs both public understanding and the competent authority's ability to grasp the full scope of social risks identified through the developer's own research.

Residents are currently facing measurable stress, anxiety, and concern directly linked to the scale and proximity of the proposal, as indicated by available summaries. These impacts are based on actual engagement rather than speculation. However, the failure to release the complete assessment hampers thorough examination of these findings and restricts the assessment of their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal threatens community identity and cohesion, with the developer's own findings noting a risk of “cultural loss.” Nonetheless, these social impacts have not been adequately incorporated into the main application nor given the necessary consideration. The withholding of the full

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

This lack of transparency significantly undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health effects is vital for developments of this magnitude, especially when community character and functioning could be at stake. Without the complete dataset, the application does not provide a thorough evidential foundation for evaluating the balance between benefits and harm.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development proposals are expected to foster positive health outcomes and avoid harm; however, available evidence suggests existing negative effects that have not been fully revealed. Consequently, without the complete assessment, compliance with this policy remains unproven.

The procedural consequences are considerable. The competent authority is unable to perform a robust evaluation of socio-economic and health implications due to the unavailability of the full Social Impact Assessment. This represents a significant omission within the application and a failure to fulfil the evidential requirements mandated by the Environmental Impact Assessment process.

In summary, the non-disclosure of the full Social Impact Assessment, alongside the evidence of ongoing adverse impacts, renders the evaluation 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 proposed development raises significant concerns regarding its impact on the landscape, seascape, and cultural heritage of the West Lewis area. The assessment provided does not sufficiently address the scale of the proposed changes or the sensitivity of the surrounding environment. The coastline is characterised by an open Atlantic horizon and an undeveloped, remote atmosphere. The installation of large-scale turbines near the shoreline would introduce a pervasive industrial element that fundamentally transforms the landscape in a permanent and irreversible manner.

Moreover, the magnitude of the visual change has not been adequately represented within the application. Given the size and proximity of the turbines, they would dominate views from residential areas and historic sites, as well as from popular coastal locations. This situation would significantly undermine visual amenity and diminish the area's essential qualities of naturalness and remoteness. The assessment fails to convey the true level of this impact, particularly within such a sensitive landscape.

Methodological issues have also been identified concerning the choice and

presentation of visual viewpoints. Evidence indicates that the selected viewpoints may not effectively represent the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and valued landscapes. This oversight raises concerns that the extent of visual impact has been understated, compromising the credibility of the assessment.

Additionally, the application overlooks the vital connections between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a larger landscape context that is visually and spatially linked to the Atlantic horizon. Rather than acknowledging these interdependencies, the assessment treats these assets as isolated, leading to an incomplete understanding of the impacts on their context and cultural significance.

The industrialisation of the seascape would sever these critical relationships, altering how heritage assets are perceived and disrupting their connection to the natural horizon. This transformation represents not only a visual issue but also a broader cultural and spatial harm that has not been thoroughly evaluated in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4, which aims to protect natural environments and historic assets. The scale of the proposed changes is at odds with the need to preserve landscape character, visual amenity, and the settings of culturally significant locations. The lack of a comprehensive worst-case assessment further undermines the argument for compliance with established policy.

It is evident that the identified impacts are unlikely to be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be overwhelmingly dominant and unavoidable. Consequently, the resulting changes would be fundamental and permanent, rather than amenable to reduction through mitigation measures.

Overall, the assessment inadequately portrays the extent of the impact, the sensitivity of the environment, and the interconnectedness of the landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal entails significant seabed preparation and installation activities within a challenging Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. This insufficiency hinders a thorough assessment of potential environmental effects, relying instead on unspecified mitigation and contingency measures to be developed after consent, which prevents a meaningful evaluation of their sufficiency.

Particularly alarming is the absence of detailed emergency response procedures, which exacerbates concerns about environmental protection. By postponing contingency

planning until after consent, the application hinders the ability to assess whether adequate safeguards are in place for pollution incidents, introducing procedural risks that compromise the competent authority's evaluation of environmental measures at the determination stage.

The coastline of West Lewis is known for its clean coastal waters and vital habitats, which are at risk of disturbance and contamination. While the application acknowledges hazards such as sediment mobilisation and accidental spills, it does not present enough information on prevention, control, or monitoring strategies. Furthermore, the uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbances and cable installations complicates the assessment. Without robust modelling and clearly articulated management approaches, the ecological effects, duration, and extent of these impacts cannot be accurately determined.

From a regulatory viewpoint, the lack of defined mitigation measures and detailed management strategies raises serious concerns about compliance with the Environmental Impact Assessment regime. The assessment of significant effects and mitigation must occur before consent, and absent this information, a lawful determination becomes unattainable. Collectively, these deficiencies render the assessment materially inadequate, obstructing a thorough review of construction and pollution risks, and further affirm the assertion 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 vital fishing industry, yet the application does not adequately evaluate the ecological or socio-economic impacts of the proposed development. A significant concern is the assumption that fishing activities can be displaced without any negative consequences. The lack of evidence regarding the availability and accessibility of alternative fishing grounds, which could support increased pressure, is alarming. This gap could lead to overfishing in other areas and negatively affect the local fishing fleet’s economic stability. Without a thorough, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Additionally, the proposal poses considerable risks to marine species, particularly due to the underwater noise from construction activities. The anticipated high-energy hammer piling over an extended period is expected to disturb marine life over vast distances, with species like dolphins particularly affected. The predicted disturbance to a significant portion of the local bottlenose dolphin population is troubling, yet the application minimizes these effects without adequate supporting data.

Moreover, the application exhibits contradictions by acknowledging the necessity for licenses to permit harm to European Protected Species while simultaneously describing the impacts as negligible. This inconsistency calls into question the reliability of the assessment and raises issues regarding compliance with the Habitats Regulations, especially since harm appears to be anticipated to a level that would

require legal authorisation.

The assessment further neglects to consider the cumulative impacts arising from various 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 implications for marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure associated with this project is fundamentally lacking and does not take into account the full range of impacts resulting from what constitutes a single integrated development. The offshore turbines and the onshore works are inherently interconnected; however, they are evaluated in isolation, leading to a disjointed approach that conceals the true magnitude of environmental and socio-economic consequences.

Onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure traversing sensitive landscapes. These activities necessitate excavation in areas of deep peat, especially within Barvas Moor, which serves as a significant carbon reserve and is an ecologically sensitive environment. The application fails to offer a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application obstructs an accurate evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project be examined collectively; yet the disjunction of offshore and onshore elements means that the combined effects on peatlands, habitats, and local communities remain inadequately understood.

Moreover, the proposal raises substantial concerns regarding carbon balance. Disturbance of peatland can release stored carbon, potentially creating a carbon debt that runs counter to the goals of renewable energy initiatives. The application does not sufficiently address this concern or confirm that the overall carbon balance is favourable.

There are notable risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy measures. The application does not establish that the impacts on these habitats have been thoroughly evaluated or that suitable avoidance strategies have been implemented. This reveals a significant evidential gap in terms of biodiversity protection.

Additionally, routing infrastructure through active croft land introduces potential conflicts with existing land uses and legal entitlements. The application lacks evidence that the requisite consents or procedures have been initiated, raising doubts about the feasibility and lawful execution of the project.

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

In conclusion, the fragmentation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts culminate in a submission that is incomplete and unreliable, thereby preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is deficient as it entirely lacks an evaluation of dark skies and nocturnal wildlife, which constitutes a material omission. The West Lewis coastline is noted for its exceptionally dark skies, integral to the area’s environmental quality, cultural identity, and tourism. The proposed development would introduce permanent red aviation lighting that is visible over long distances, resulting in a continuous and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment.

Significantly, the application fails to assess the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly consequential given the relevance of dark skies to the area’s identity and the growth of tourism sectors such as astro-tourism. The lack of such assessments creates a distinct gap in the overall landscape and environmental evaluation.

Moreover, there is no consideration of the potential impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel exhibit high sensitivity to artificial lighting, which can result in disorientation and an increased risk of collision. The absence of any lighting impact assessment or phototaxis study means there is no understanding of how aviation lighting may affect these species or contribute to higher mortality rates.

This gap is further exacerbated by the reliance on daytime survey data within the

ornithological assessment, which overlooks nocturnal activity and associated risks. Kittiwakes, which may forage or migrate at night, are similarly at risk of disorientation from artificial lighting, yet this has not been evaluated. The lack of site-specific night-time data leaves a critical void in comprehending ecological impacts.

Without a thorough assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would face adverse consequences. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt is not fulfilled, thereby invoking the precautionary principle and inhibiting a lawful determination.

From a policy standpoint, the omission contravenes National Planning Framework 4 concerning the safeguarding of natural places and environmental quality. Additionally, it undermines the comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is a crucial element of the overall setting.

In conclusion, the absence of assessments related to dark skies and nocturnal wildlife represents a significant evidential gap. The deficiency of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unsuitable for a lawful determination.

TOURISM

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

Tourism has experienced significant 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. Nonetheless, the application does not model the potential impacts of seascape industrialisation and environmental quality loss on Tourism Gross Value Added or broader economic resilience. Without this analysis, it remains unclear whether the development would yield a net economic benefit or potentially harm a well-established and expanding sector.

The assessment neglects to address the role of environmental quality in enhancing tourism, particularly the importance of unspoiled landscapes and dark skies for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, resulting in a considerable gap in understanding the impacts on a recognised and growing aspect of the local economy.

In light of an island community with limited economic diversification, the failure to

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

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

Ultimately, the lack of quantification of tourism impacts, the failure to assess environmental factors influencing visitor behaviour, and the disregard for the island's economic dependency result in a significant evidential gap. This inadequacy prevents 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 signifies a profound inadequacy in meeting the standards of sustainable development, as established by statutory duties and national policy. It echoes the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. However, this application is now under a more rigorous policy framework, which places greater emphasis on biodiversity, peatland preservation, landscape integrity, and the well-being of communities.

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

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

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

adequately assessed, obscuring the implications for peatlands, carbon balance, habitats, and crofting land.

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

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

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

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

Additional Comments

It is absolutely wrong that the whole of the north of Scotland, Highlands & Islands are getting covered in wind farms, green energy is a scam....the carbon footprint of all these schemes is huge & has no long term benefits for people or environments. Its money laundering on a huge scale between government & energy companies, they are the only ones who benefit financially. We pay more for our power than the rest of the country yet its on our doorstep all the power is being produced! Ruining our landscape & has a massive impact on our wildlife. Its also bringing lots of workmen to the island & although that pays into the economy short term it brings many anti social problems, we have seen this many times, drug dealing, sexual harassment in the pubs, fighting. Let's see what happens after the election.

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: 50C2A5E2

Member of the public 667

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. The objection is rooted in a review of the Environmental Impact Assessment Report and associated documentation, which reveals significant deficiencies in planning, environmental, cultural, and procedural areas. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline and rich cultural identity, as well as its near-pristine environment.

The application lacks sufficient evidence for a lawful decision. Important environmental data is absent, and the baseline information provided is both limited and inconsistent. Key elements of the proposal remain undefined. The use of a flexible design framework obscures an understanding of the likely significant effects, while unspecified mitigation measures hinder any assessment of their potential effectiveness. Consequently, the provided documentation fails to offer a comprehensive understanding of the environmental, cultural, or community impacts, making the claims of negligible or non-significant effects unsupported.

Furthermore, there are notable 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 places, cultural heritage, and health and wellbeing. It does not sufficiently demonstrate adherence to national requirements to protect biodiversity, climate interests, and environmental integrity. These issues directly impact the statutory tests required for consent and challenge the competent authority's ability to assess the development's acceptability within policy frameworks.

The scale of the proposal is unprecedented for this area, with large turbines situated near the shoreline, raising serious concerns about landscape capacity, visual dominance, and environmental impacts. The combination of inadequate information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy violations indicates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle should 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 evaluation of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed, failing to deliver a complete understanding of the ecological receptors involved. This coastal area is known to be biologically rich and sensitive, yet the existing baseline data is insufficient, and the methods employed do not effectively capture essential information about species presence, behaviours, and habitat utilisation. Consequently, the assessment lacks a reliable evidential foundation

for impact evaluation.

One significant shortcoming pertains to otters, classified as a European Protected Species. The application does not adequately address or evaluate the active utilisation of coastal regions by otters for foraging and movement. This oversight neglects their core foraging range and behavioural patterns, resulting in an inadequate assessment of the potential impacts related to construction disturbances, noise, and increased activity. Such a gap undermines any assertions regarding the lack of significant effects on otter populations.

Furthermore, there are serious shortcomings in the evaluation of basking sharks, particularly as it relies heavily on aerial surveys that are prone to considerable detection biases in Atlantic conditions. This methodology likely leads to an underestimation of the species' presence, especially when compared to established land-based observations that show regular usage of these waters. The failure to integrate or properly consider such crucial data contributes to an incomplete baseline, thereby diminishing the trustworthiness of the conclusions drawn.

These methodological flaws mean that any assertions of negligible or non-significant impacts are founded on assumptions rather than solid evidence. Additionally, the lack of comprehensive baseline data hampers a meaningful evaluation of cumulative and indirect effects, including those related to seasonal variations and broader ecosystem interactions. This introduces significant uncertainty regarding the actual risks to marine species and habitats.

From a regulatory viewpoint, the application does not satisfy the stipulations set forth by the Environmental Impact Assessment framework and National Planning Framework 4, as it fails to adequately identify or evaluate protected species. The uncertainty created by these inadequacies obstructs the possibility of ruling out adverse effects with reasonable scientific certainty, thus invoking the precautionary principle. In this context, granting consent would not be legally permissible.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsupported conclusions ultimately renders the assessment unreliable. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, affirming that the application does not present a solid evidential basis for approval.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development lacks reliability due to significant internal inconsistencies and methodological weaknesses, leading to insufficient evidence. It fails to meet the necessary evidential standards required to ascertain no adverse effect on the integrity of protected sites. The application contains contradictory conclusions, raising questions about the reliability of its findings. Importantly, the presence of data gaps and limitations in the modelling approaches employed means that the standard of beyond reasonable scientific doubt has not been achieved, thereby

invoking the precautionary principle.

The assessment inadequately evaluates the implications of potential displacement, collision risks, and habitat loss for seabird populations, particularly within key foraging areas and migratory pathways along the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline. Additionally, it does not sufficiently demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not fully recognised, and the reliance on modelling introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars, where mortality rates are likely underestimated due to incomplete baseline data and unexamined behavioural responses.

Furthermore, the location of turbines within a recognised migratory corridor raises significant concerns, as it effectively creates a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor have not been adequately assessed, nor have the potential impacts on species with relatively small global populations been thoroughly explored.

From a regulatory standpoint, the proposal fails to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the application in direct conflict with national policy.

In conclusion, the combination of methodological deficiencies, insufficient evidence, and internal inconsistencies renders the ornithological assessment unreliable. These issues prevent a thorough evaluation of the potential impacts, ultimately indicating that the application does not satisfy the statutory requirements necessary for proper determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are active burial and spiritual places. Yet, these are mischaracterised as static features in the assessment, which fails to acknowledge their continued use, meaning, and the potential impact of development on their setting. This oversight leads to an incomplete evaluation of cultural effects and neglects their significance in community life.

The assessment also overlooks intangible cultural heritage, such as the Gaelic language and traditions, along with the deep connection between the community and

the coastal environment. These aspects are vital to the identity of the area and their absence signifies a significant omission. Without addressing these factors, the cultural impact of the development cannot be accurately assessed.

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

A critical procedural failure is the lack of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority cannot fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

These deficiencies conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage and to recognise living cultural practices is a clear deviation from policy requirements.

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not provide a sufficient basis for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents, yet the full report has not been published, creating a significant evidential gap. This omission hinders both public understanding and the competent authority's ability to assess the extent of social risks identified through the developer’s research. Available summaries suggest that residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement, not speculation, but the lack of transparency surrounding the full assessment limits proper scrutiny of these findings.

Moreover, there is an indication that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. However, these critical impacts have not been adequately integrated into the main application or assigned appropriate weight. The failure to disclose the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process.

A thorough understanding of the social, economic, and health impacts is crucial for developments of this scale, especially when community character and functioning may be at risk. By withholding the complete dataset, the application lacks 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 concerning health and wellbeing. Development is required to foster positive health outcomes and avoid negative impacts, yet available evidence indicates existing adverse effects that have not been fully revealed. Without the complete assessment, compliance with this policy cannot be confirmed.

The procedural consequences of this situation are considerable. The competent authority cannot carry out a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This absence signifies a material omission within the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

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

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

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

Another significant shortcoming is the lack of an evaluation of the interconnected relationship between landscape, seascape, and cultural heritage. The Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape

setting that is visually and spatially linked to the Atlantic horizon. The assessment treats these assets as separate entities, failing to acknowledge their interdependence, which results in an incomplete evaluation of the impacts on their setting and cultural significance.

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The application presents a materially deficient assessment of construction and pollution risks, failing to provide the necessary detail to evaluate likely environmental effects. Despite the proposal involving significant seabed preparation and installation works in a high-energy Atlantic environment, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be developed post-consent, thereby hindering a meaningful assessment of their adequacy or effectiveness.

Particularly alarming is this reliance on undefined future measures, especially in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks sufficient detail regarding the prevention, control, or monitoring of these risks.

There is considerable uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of

robust modelling and clearly defined management strategies, it remains 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 recognised as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application undermines the evaluation of whether suitable safeguards are established to address pollution events. This introduces procedural risk and compromises the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures are evaluated prior to consent, and the absence of such information renders a lawful determination unattainable. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the deficiencies related to the undefined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively indicate that the assessment is materially deficient. These inadequacies obstruct a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry. However, the application lacks a thorough assessment of how these vital uses and habitats can be preserved without significant disruption. One major concern is the assumption that fishing activities can be relocated without negative effects. The application does not provide evidence that alternative fishing grounds exist or can handle the additional pressure, which poses a serious risk of overfishing in other areas and could have wider economic repercussions for local fishermen.

Additionally, the proposal presents considerable risks to marine species, notably due to underwater noise from construction activities. The prolonged use of high-energy hammer piling could disturb marine life over large distances, particularly affecting dolphins. The application suggests that the disturbance to a significant portion of the local bottlenose dolphin population is not substantial, yet this claim is made without adequate supporting evidence, raising serious concerns about its validity.

Furthermore, the application acknowledges the necessity for licences to allow harm to European Protected Species, while simultaneously downplaying the potential impacts as negligible. This contradiction raises doubts about the assessment's reliability and compliance with the Habitats Regulations, especially where harm is expected to require legal authorisation. The assessment also neglects to address cumulative

impacts from various pressures such as habitat disturbance, noise, and fishing displacement. Without a thorough evaluation of these combined effects, it is impossible to accurately gauge the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not establish that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, making it difficult to conclude that the proposal aligns with sustainable development principles. Collectively, the lack of evidence regarding fishing displacement, the underestimation of noise impacts, and the internal inconsistencies render the assessment insufficient and untrustworthy. These issues hinder any reliable evaluation of the potential effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal includes significant infrastructure developments such as cabling across protected moorland and the construction of a substation near Stornoway, with access routes traversing sensitive landscapes. These operations involve excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and ecologically delicate habitat. However, the application fails to provide a comprehensive assessment of the impacts on these crucial environments, limiting our understanding of the project's overall environmental footprint.

The separation of the offshore turbines and onshore works is a critical flaw, as these components are intrinsically linked yet assessed independently. This fragmented approach obscures the true scale of the environmental and socio-economic effects that arise from the project, preventing a thorough evaluation of cumulative impacts. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively, but this is not the case here. Consequently, the combined impacts on peatlands, habitats, and local communities are inadequately understood.

In addition to this, the application does not convincingly demonstrate that the impacts on sensitive habitats, including machair systems and peatland environments that are subject to policy protection, have been thoroughly assessed. It raises evident gaps in relation to biodiversity protection, indicating a lack of appropriate avoidance measures.

Concerns also arise regarding the carbon balance due to the disturbance of peatland, which can release stored carbon and create a carbon debt, contradicting the objectives of renewable energy development. Unfortunately, the application does not sufficiently address this matter or prove that the overall carbon balance remains beneficial.

Furthermore, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is a lack of evidence showing that necessary consents or processes have been initiated, which raises significant questions about the deliverability and lawful implementation of the project.

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

Taken as a whole, the separation of project components, the lack of a comprehensive assessment, and the insufficient evidence regarding environmental and land use impacts result in an incomplete and unreliable application, thereby hindering a lawful determination.

TOURISM

The assessment of tourism impacts is critically inadequate, neglecting to evaluate the economic and social ramifications for a key sector of the Isle of Lewis economy. Tourism thrives on the area's wild coastline, nearly untouched landscape, dark skies, and overall sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified evaluation of how extensive offshore infrastructure might affect visitor numbers, behaviours, or the overall economic contribution of this sector.

The tourism sector has experienced substantial growth, rising from £65 million in 2017 to more than £81.5 million, which supports over 1,000 jobs and represents up to 16% of the island’s economy. However, the application does not model how the industrialisation of the seascape and a decline in environmental quality would impact the Tourism Gross Value Added or broader economic resilience. Without such analysis, it remains unclear if the development would provide a net economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment inadequately considers the importance of environmental quality in supporting tourism, especially the value of pristine landscapes and dark skies to visitor experiences and burgeoning markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, leaving a significant gap in understanding the impacts on a recognised and flourishing segment of the local economy.

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

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

Overall, the failure to quantify tourism impacts, evaluate the environmental factors influencing visitor behaviour, and consider the island's economic dependency creates a significant evidential gap. This hinders a thorough assessment of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

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

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

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

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

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

Additionally, the proposal would lead to substantial and irreversible alterations to a

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

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

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

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: E5C758A4