Member of the public 900

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with the marine licensing and Environmental Impact Assessment regulations. A thorough review of the Environmental Impact Assessment Report and the accompanying documentation reveals several material deficiencies across planning, environmental, cultural, and procedural aspects. The project is located 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 design of this proposal, alongside its proximity to the shoreline, raise fundamental questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential foundation necessary for a lawful determination. Important environmental data is absent, and the baseline information provided is both limited and inconsistent, leaving key elements of the proposal undefined. The application employs a flexible design framework that obscures an understanding of the likely significant effects, and the reliance on unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, and claims asserting negligible or non-significant effects lack robust supporting evidence.

There are evident and serious conflicts with established policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment process, or National Planning Framework 4, especially concerning biodiversity, cultural heritage, natural places, and public health. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and overall environmental integrity. Such conflicts directly impact the statutory tests needed for consent, undermining the competent authority's ability to deem the development acceptable within policy frameworks.

The unprecedented scale of the proposal introduces large turbines situated near the shoreline, creating significant concerns related to landscape capacity, visual dominance, and overall environmental impact. In light of the insufficient information provided, the reliance on undefined mitigation measures, evidential shortcomings, and apparent policy non-compliance, it is clear that the application is incomplete and cannot support a lawful determination. In these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application heavily relies on mitigation measures, monitoring strategies, and management plans that remain undefined. This approach seeks consent based on the premise that any environmental harm will be addressed post-consent, which obstructs a thorough evaluation of their effectiveness or the assessment of residual impacts. Such deferral of essential information to later stages 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 determination.

Additionally, the Environmental Impact Assessment Report is materially deficient, lacking a full, transparent, or reliable account of the proposal's likely environmental effects. The use of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, injects significant uncertainty into the assessment process. This ambiguity undermines the integrity of the evaluation and means that the impacts presented may not correspond to the actual development, thus inhibiting both public understanding and the competent authority's ability to grasp the true extent of environmental effects.

The report also presents significant evidential deficiencies. There are noticeable gaps in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are made without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that does not align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold needed under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, including the need for biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been comprehensively assessed or that suitable safeguards are established.

In summary, the combination of reliance on an undefined design envelope, absence of specific mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies prevent a lawful and robust assessment of environmental effects, leaving the competent authority unable to make a fully informed determination 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 of marine ecology and protected species is fundamentally flawed, resulting in a lack of a complete and reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is recognised as a highly sensitive and biologically active marine system, yet the methodologies employed and the baseline data provided are insufficient to capture the presence, behaviour, and habitat use of the relevant species. Consequently, the assessment fails to establish a solid evidential basis for evaluating potential impacts.

Notably, there is a significant oversight regarding otters, which are classified as a

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of ornithology associated with this application reveals critical flaws, characterised by internal inconsistencies and notable gaps in evidence. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already experiencing decline. However, the application fails to provide the necessary evidential support to demonstrate that these species will remain unaffected. It is noteworthy that the development is situated in key foraging areas and along migratory pathways, yet the implications of potential displacement, collision risk, and habitat loss have not been thoroughly evaluated.

There is a significant contradiction within the application, as the developer asserts that there will be no significant adverse effects while simultaneously preparing a Habitats Regulations derogation case, which typically implies that significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that its conclusions are not substantiated by the available evidence. Furthermore, the assessment lacks sufficient evidence regarding the impact on seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. The significance of these feeding grounds is inadequately recognised, and the modelling approaches used introduce uncertainty, particularly concerning species that are in severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is lacking and behavioural responses of these species are not completely understood.

The positioning of turbines within a recognised migratory corridor introduces further risk, creating a barrier within a primary flight path used by birds migrating between the United Kingdom and Iceland. The application does not provide an adequate assessment of the long-term consequences of sustained mortality within this corridor or consider the potential effects on species with relatively small global populations.

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

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

In conclusion, the assessment is rendered unreliable due to its internal inconsistencies, methodological shortcomings, and lack of sufficient evidence. These failings hinder a thorough evaluation of impacts and contribute to the overall finding that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is recognised as a living cultural landscape where the environment, language, tradition, and community are deeply interconnected. However, the assessment of cultural heritage and community identity fails to acknowledge this relationship and adopts a reductive view, treating heritage merely as isolated, static assets. This approach neglects their ongoing social, cultural, and spiritual significance within the community.

Culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are active places of burial and spiritual practice. The assessment, however, erroneously categorises them as static features, overlooking their continued use and the development's impact on their surroundings. This mischaracterisation results in an incomplete evaluation of the cultural effects and disregards the sites' importance to community life.

Moreover, the assessment does not consider intangible cultural heritage, including the Gaelic language and traditions, which are integral to the area's identity. The failure to include these elements represents a substantial omission that impedes a proper understanding of the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, identified as possessing a distinct cultural identity akin to that of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's legitimacy and disregards established principles regarding participation in matters affecting cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment contravenes the statutory requirement set out in the Islands (Scotland) Act 2018. Without this crucial assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community, which prevents a lawful determination.

These shortcomings place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to account for both tangible and intangible heritage, as well as the living cultural practices of the community, constitutes a clear deviation from policy requirements.

Ultimately, the collective failures to assess living heritage, intangible cultural value, community rights, and statutory obligations result in a significant evidential gap. The application does not adequately address the cultural impacts of the development, providing an insufficient basis for evaluating the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the full Social Impact Assessment is a critical issue that undermines the assessment of social impacts, health, and wellbeing associated with the proposed development. Although the developer has engaged local residents through focus groups, the absence of the complete report represents a significant evidential gap. This gap restricts both public understanding and the competent authority’s ability to fully grasp the social risks highlighted in the developer’s own research.

Evidence shows that residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are thus factual, not speculative. The lack of transparency in sharing the full assessment hinders proper scrutiny of these findings and limits the assessment of their significance in the decision-making process.

Moreover, there is a perception among residents that the proposal threatens community identity and cohesion, with indications of “cultural loss” noted in the developer’s findings. Yet, these social impacts have not been adequately integrated into the application or given the necessary weight. Consequently, the withholding of the full assessment obscures the true human and social cost of the development.

This failure of transparency significantly undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly when they may affect community character and functioning. Without the full dataset, the application lacks a comprehensive evidential basis for weighing the balance between potential benefits and harms.

From a policy standpoint, the application does not satisfy the requirements of National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and avoid harm; however, the available evidence reveals existing adverse effects that have not been fully disclosed. Consequently, it is impossible to demonstrate compliance with this policy in the absence of the full assessment.

The procedural implications of this situation are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the entire Social Impact Assessment. This omission constitutes a material flaw within the application, failing to meet the evidential requirements of the Environmental Impact Assessment regime.

In summary, the combination of non-disclosure of the complete Social Impact Assessment and the documented existence of adverse impacts renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual and landscape impacts of the proposed development is inadequate and does not reflect the significant changes or the sensitivity of the West Lewis coastline. This area is known for its open Atlantic horizon and undeveloped character, which provide a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a dominant industrial presence, fundamentally altering the area’s character and resulting in a permanent transformation of the landscape.

The application does not effectively depict the extent of visual change. The size and closeness of the turbines would dominate views from residential locations, historic sites, and popular coastal areas. This would adversely affect visual amenity and diminish the naturalness and remoteness that define the region. The assessment fails to adequately communicate the level of impact or its importance within this sensitive landscape.

Methodological issues also arise concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact has been underestimated, which undermines the assessment's reliability.

Moreover, there is a failure to consider the interconnected relationships between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as separate entities rather than recognising their interdependence, resulting in an incomplete evaluation of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and affecting their relationship with the natural horizon. This represents not only a visual impact but also a 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 regarding the protection of natural areas and historic assets. The magnitude of change is at odds with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further calls into question the proposal’s compliance with policy requirements.

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

In summary, the assessment inadequately represents the scale of impact, the sensitivity of the environment, and the interlinked nature of landscape and heritage. These shortcomings hinder a reliable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns regarding the assessment of construction and pollution risks, which is notably incomplete and lacking the necessary detail for

evaluating potential environmental effects. With substantial seabed preparation and installation works proposed in a high-energy Atlantic environment, the absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans is particularly troubling. Instead, the application places reliance on undefined mitigation and contingency measures to be established after consent, which prevents any meaningful assessment of their adequacy or effectiveness.

The sensitivity of the receiving environment amplifies these concerns. 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, including sediment mobilisation and accidental chemical or oil spills, it does not provide adequate details on how these risks will be prevented, controlled, or monitored.

There is also a lack of clarity 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, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty extends to potential effects on marine species and habitats that have already been identified as sensitive in the wider assessment.

Moreover, the absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent stage, the application obstructs the ability to evaluate whether proper safeguards are in place to address pollution events. This not only introduces procedural risk but also undermines the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory viewpoint, the deferral of critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated prior to consent, and in the absence of such information, a lawful determination cannot be achieved. The application further fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application proposes development activities that could significantly disrupt the marine ecosystem and the fishing industry off the West Lewis coast, yet it lacks a robust assessment of the ecological and socio-economic impacts. The region is home to a diverse marine ecosystem and an active fishing community, but the proposal fails to demonstrate how these critical uses and habitats will be protected or maintained.

A major concern is the assumption that displacing fishing activity can occur without adverse effects. The application does not provide evidence that there are alternative fishing grounds that are available, accessible, or capable of handling any additional pressure. This gap in evidence is critical, as it presents the risk of overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a clear and evidence-based assessment, understanding the potential impacts on fisheries and livelihoods remains incomplete.

The proposal also poses significant risks to marine species, particularly due to the underwater noise generated during construction. High-energy hammer piling over an extended duration is expected to cause disturbances over considerable distances, impacting species such as dolphins. The anticipated disturbance to a significant proportion of the local bottlenose dolphin population raises serious concerns; however, the application diminishes the importance of these impacts without adequate supporting evidence.

Inconsistencies within the application are evident, particularly in acknowledging the need for licenses to permit harm to European Protected Species while simultaneously describing the anticipated impacts as negligible. This contradiction undermines the credibility of the assessment and raises issues regarding adherence to the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is fundamentally lacking and does not account for the full range of impacts that arise from this single integrated project. The offshore turbines and the onshore works are inherently connected; however, they are evaluated separately, leading to a disjointed approach that obscures the true scale of environmental and socio-economic consequences.

Included in the onshore elements are cabling that crosses protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, especially within Barvas Moor, a vital carbon store and ecologically delicate habitat. The application fails to deliver a thorough assessment of these impacts, thus 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 be considered collectively; nevertheless, the division between offshore and onshore elements results in an incomplete understanding of the combined effects on peatlands, habitats, and local communities.

There are significant risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not convincingly show that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This presents a distinct evidential gap concerning biodiversity protection.

Furthermore, the routing of infrastructure across active croft land raises concerns about potential conflicts with existing land use and legal rights. The application does not supply evidence that the necessary consents or procedures have been initiated, which casts doubt on the deliverability and lawful implementation of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed development introduces permanent red aviation lighting that is visible over long distances, which would create a continuous "wall of light" effect across the western horizon. This lighting would fundamentally alter the night-time environment along the West Lewis coastline, which is known for its exceptionally dark skies. These dark skies are a critical aspect of the area's environmental quality, cultural identity, and tourism value, making the lack of assessment regarding their impact a significant oversight in the Environmental Impact Assessment.

The application fails to evaluate the effects of this lighting on visual amenity, landscape

character, and the experiences of both residents and visitors. This is particularly concerning given the growing interest in sectors such as astro-tourism, which rely heavily on the preservation of dark skies. The absence of such an assessment creates a notable gap in the overall landscape and environmental evaluation.

Moreover, there is no consideration of the impacts on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can lead to disorientation and increased risks of collision. The application does not incorporate any lighting impact assessment or phototaxis study, and consequently, it fails to address how aviation lighting might affect these vulnerable species or escalate mortality rates.

This deficiency is further exacerbated by the dependence on daytime survey data within the ornithological assessment, which does not account for nocturnal activities or the associated risks. For example, Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation due to artificial lighting; however, this potential impact has not been evaluated. The lack of site-specific night-time data results in a critical shortcoming in understanding the ecological consequences.

Without an assessment of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard required to confidently rule out negative consequences cannot be achieved, thus invoking the precautionary principle and hindering a lawful determination of the application.

From a policy standpoint, this omission is at odds with National Planning Framework 4, which advocates for the protection of natural environments and the quality of the landscape. Furthermore, it undermines the broader evaluation of landscape and seascape impacts, as the character of night-time environments is an essential aspect of the overall ecology.

In conclusion, 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 incapable of facilitating a lawful determination.

SUMMARY

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

There are considerable deficiencies in the evidential basis required for determination.

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

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

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

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

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

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

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

Additional Comments

The bulldozing through massive local objection and concern of this project is despicable. The environmental, social, and cultural damage will be irreparable.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 0DF344F4

Member of the public 901

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is grounded in an analysis of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is located off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, relatively unspoiled environment, and strong cultural identity. The proposal's scale, design, and proximity to the shoreline raise critical concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

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 key elements of the proposal remain undefined. The employment of a flexible design framework obscures the understanding of likely significant effects, while the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects are not underpinned by robust evidence.

There are notable and substantial conflicts with existing policy. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not sufficiently demonstrate that national requirements aimed at protecting biodiversity, climate interests, and environmental integrity can be fulfilled. These conflicts are directly related to the statutory tests necessary for consent, thereby undermining the competent authority's ability to conclude that the development meets acceptable policy standards.

The unprecedented scale of the proposal raises significant concerns regarding landscape capacity, visual impact, and environmental repercussions. With large turbines situated close to the shoreline, the application’s deficiencies—including insufficient information, reliance on undefined mitigation strategies, and evident policy non-compliance—render it incomplete and incapable of supporting a lawful determination. In light of these circumstances, the precautionary principle should be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents a notably flawed assessment of marine ecology and protected species, failing to establish a complete and reliable understanding of ecological receptors within the West Lewis coastal environment. This area is recognised as a highly sensitive and biologically active marine system, yet the baseline data provided is insufficient, and the methodologies employed do not adequately capture species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a sound evidential basis for evaluating potential impacts.

A significant shortcoming is the inadequate recognition and assessment of otters, a European Protected Species, particularly regarding their active use of coastal areas for foraging and movement. The assessment neglects to consider their core foraging range and behavioural patterns, leaving the potential effects of construction disturbance, noise, and increased activity inadequately evaluated. This oversight undermines the validity of any conclusions drawn about the absence of significant effects on this species.

In addition, there are considerable deficiencies in the evaluation of basking sharks. The reliance on aerial surveys introduces a substantial detection bias, especially under Atlantic conditions, which likely leads to an underestimation of their presence compared to established land-based observations indicating frequent use of these waters. The failure to incorporate or adequately consider such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

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

From a regulatory standpoint, the application fails to fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or assessed. The uncertainty that is generated prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the precautionary principle. In light of these circumstances, the granting of consent cannot be lawful.

In summary, the assessment's reliance on incomplete baseline data, flawed methodologies, and unsupported conclusions renders it unreliable. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species and substantiate the conclusion that the application is devoid of a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application presents significant gaps in evidence and contains internal inconsistencies that fundamentally undermine its conclusions. Notably, the

west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to demonstrate, to the required evidential standard, that these species will not be adversely affected. The development site is situated within key foraging areas and migratory pathways, yet there is an inadequate evaluation of the implications related to displacement, collision risk, or habitat loss.

A critical contradiction arises within the application, as the developer asserts that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessitated where significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence. Furthermore, the assessment lacks sufficient evidence regarding the impact on seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda. The significance of these feeding grounds is not thoroughly addressed, and reliance on modelling approaches introduces considerable uncertainty, particularly for species experiencing severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly in instances where baseline data is incomplete and behavioural responses are not fully understood.

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's failure to publish the complete Social Impact Assessment fundamentally undermines the assessment of social impacts, health, and wellbeing. This lack of transparency represents a significant evidential gap, leaving both the public

and the competent authority unable to grasp the full extent of the social risks identified through the developer's own research. Despite the commissioning of this assessment and focus groups with local residents, the absence of the full report limits scrutiny of its findings and hinders the determination of their relevance in the decision-making process.

Evidence suggests that local residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct engagement rather than speculation; however, without access to the complete assessment, the seriousness of these effects cannot be appropriately considered. Furthermore, the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Yet, these significant impacts have not been adequately integrated into the main application or given the necessary weight.

The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development, which is particularly concerning given the scale of the project. Such a lack of transparency compromises the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is vital when assessing developments that may alter community character and functionality. The failure to provide the full dataset results in an application that does not present a complete 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 must facilitate positive health outcomes and mitigate harm; however, the evidence available indicates adverse effects that remain undisclosed. Without the full assessment, the application cannot claim compliance with this policy.

Moreover, the procedural ramifications are substantial. The competent authority is unable to perform a thorough socio-economic and health evaluation without the complete Social Impact Assessment, marking a material omission within the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime. The combination of non-disclosure of the full Social Impact Assessment and evidence of existing adverse impacts leads to an incomplete and unreliable assessment, obstructing a lawful determination and reinforcing the conclusion that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development involves the introduction of large-scale turbines in close proximity to the West Lewis coastline, an area characterised by its open Atlantic horizon, undeveloped nature, and significant sense of remoteness. This would create a continuous and dominant industrial presence, fundamentally altering the landscape and resulting in a permanent and irreversible transformation of the area.

The application's assessment of seascape, landscape, and visual impacts is deficient. It does not adequately convey the magnitude of the visual change that would occur. The scale and proximity of the turbines mean that they would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the key qualities of naturalness and remoteness. Moreover, the assessment fails to properly represent this level of impact or its significance in the context of a sensitive landscape.

There are serious methodological concerns regarding how visual viewpoints have been selected and presented. Evidence indicates that these viewpoints may not fully reflect the most sensitive receptors or worst-case scenarios, particularly concerning important cultural heritage sites and high-value landscapes. This raises the risk that the assessment has understated the magnitude of visual impact, undermining its reliability.

Additionally, the assessment fails to consider the interconnected relationship between landscape, seascape, and cultural heritage adequately. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, are integral to a broader landscape setting tied together by visual and spatial relationships to the Atlantic horizon. Treating these sites as isolated assets rather than recognising their interdependence results in an incomplete evaluation of their cultural significance and the impacts on their setting.

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

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 concerning the protection of natural places and historic assets. The scale of the proposed changes is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a robust worst-case assessment significantly undermines any claim of policy compliance.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks a crucial evaluation of dark skies and nocturnal wildlife, which constitutes a significant oversight. The West Lewis coastline is noted for its exceptionally dark skies, integral to the area's environmental quality, cultural identity, and tourism potential. The proposal's introduction of permanent red aviation lighting will produce a continuous and intrusive “wall of light” effect on the western horizon, fundamentally transforming the night-time environment.

Importantly, the proposal fails to assess the lighting's impact on visual amenity, landscape character, or the experiences of both residents and visitors. This is especially concerning due to the relevance of dark skies to the area's identity and the growth of tourism sectors such as astro-tourism. The absence of this assessment results in a considerable gap in the overall environmental and landscape evaluation.

Moreover, the application does not examine the consequences of artificial lighting on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly susceptible to artificial light due to phototaxis, which increases disorientation and collision risks. The lack of a lighting impact assessment or a phototaxis study means that the proposal does not adequately evaluate how aviation lighting may endanger these species or contribute to mortality.

This gap is exacerbated by the use of daytime survey data for the ornithological assessment, which fails to account for nocturnal activities and related risks. Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data further complicates the understanding of ecological impacts.

Without a thorough assessment of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard required to exclude such adverse impacts beyond reasonable scientific doubt is unmet, thereby invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this oversight contradicts National Planning Framework 4, particularly concerning the protection of natural places and the quality of the environment. Additionally, it diminishes the overall assessment of landscape and seascape impacts, as the character of night-time is an essential component of the environment.

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development, as it does not align with statutory duties, national policy, or evidential standards. This proposal mirrors the principal issues that led to the rejection of the Lewis Wind Power initiative in 2008, particularly concerning the unacceptable scale of industrialisation. Despite being submitted under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it remains deficient.

A reliable evidential basis for the determination of this application is lacking. Significant gaps exist in baseline data, and the continued use of an undefined design envelope raises concerns. The proposal relies on unspecified mitigation measures and neglects to address critical impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete and fails to provide a comprehensive understanding of potential significant effects or residual impacts.

Procedural shortcomings are also evident, notably the absence of a compliant Island Communities Impact Assessment, which constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the incomplete disclosure of the Social Impact Assessment is a material omission that hampers the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies make the application unfit for determination.

The proposal conflicts with National Planning Framework 4, as it does not adequately protect biodiversity, natural places, and cultural heritage. It also fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Furthermore, the cumulative impact of both offshore and onshore elements has not been properly assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and internally inconsistent in some areas. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and preventing any lawful conclusion regarding acceptable impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The significant deficiencies in information, along with policy conflicts and unresolved environmental risks, impede a lawful, evidence-based decision. The competent authority must refuse consent based on these grounds or invoke relevant regulatory

provisions to demand the submission of the missing information.

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

Additional Comments

I am concerned by the sheer number of industrial developments being planned across rural Scotland, with so much harm to wildlife and the destruction of Scotland's natural beauty. This is not about net zero and will not reduce anyone's bills but will make profits for private companies.

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: 70E1519A

Member of the public 902

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. It is informed by a thorough review of the Environmental Impact Assessment Report and related documentation, highlighting significant planning, environmental, cultural, and procedural deficiencies. The proposed development is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, relatively unspoiled environment, and rich cultural heritage. The scale and design of this proposal, along with its proximity to the shoreline, raise serious questions regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation for lawful determination. There are critical gaps in environmental data, with baseline information being both limited and inconsistent, while significant aspects of the proposal remain undefined. The adoption of a flexible design framework obscures the understanding of potential significant effects, and the reliance on unspecified mitigation measures renders it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidential support.

Moreover, there are evident and significant conflicts with policy. The proposal does not appear to comply with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not prove that it can fulfil national obligations to safeguard biodiversity, climate interests, and environmental integrity. These inconsistencies directly undermine the statutory tests necessary for consent and compromise the ability of the competent authority to deem the development acceptable within policy frameworks.

The unprecedented scale of the proposal in this area, with large turbines situated close to the shoreline, raises major concerns about landscape capacity, visual impact, and overall environmental implications. The combination of inadequate information, reliance on undefined mitigation strategies, evidential shortcomings, and clear non-compliance with policy illustrates that the application is incomplete and fails to support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and fails to deliver a complete, transparent, or trustworthy depiction of the likely environmental effects associated with the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This lack of specificity hinders the ability to consistently apply a worst-case scenario, compromising the assessment's integrity. As a result, the impacts outlined may not accurately represent the development that will ultimately be constructed, limiting both the public's and the competent authority's capacity to grasp the full extent of environmental effects.

The application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the premise that environmental harm will be addressed later precludes any thorough evaluation of effectiveness or assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which necessitates that likely significant effects and mitigation measures be clearly established prior to determination.

Moreover, there are substantial evidential shortcomings, including gaps in baseline data, methodological limitations, and the use of assumptions instead of site-specific evidence. This leads to uncertainty about the magnitude and significance of impacts, especially where conclusions regarding negligible or non-significant effects are presented without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be aligned with statutory requirements.

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

Collectively, the dependence on an undefined design envelope, the absence of specified mitigation measures, and the existing gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and robust assessment of environmental effects and result in the competent authority being unable to determine the application based on the provided information.

ASSESSMENT OF ALTERNATIVES

The evaluation of alternatives provided in the application is significantly deficient and does not satisfy the legal obligations set forth by the Environmental Impact Assessment

framework. Instead of offering a coherent and analytical comparison of viable alternatives based on their environmental implications, the submission presents a narrative detailing the development's progression. This method inadequately demonstrates that less detrimental options have been thoroughly identified, evaluated, and chosen over more harmful alternatives.

Furthermore, there is a lack of transparent, evidence-backed comparisons regarding different offshore sites, various development scales, or design configurations. Notably, the application fails to illustrate that the developer has genuinely contemplated positioning the turbines further from the shore, where the potential for visual, ecological, and coastal impacts could be considerably diminished. The sensitivity of the West Lewis coastline and the critical role that proximity to the shore plays in assessing impact make this oversight particularly concerning. Without such an analysis, it is impossible to conclude that the proposed location is the least damaging available option.

This shortcoming extends to the assessment of cable routes and landfall, where there is inadequate evidence that alternative pathways have been sufficiently explored to avoid or lessen impacts on sensitive sites, including culturally and spiritually significant areas like Barvas Cemetery. The absence of a clear avoidance strategy and the lack of comparative analysis suggest that mitigation by design has not been adequately utilised, relying instead on measures implemented after the design phase.

Consequently, the application does not convincingly establish that environmental harm has been mitigated through careful site selection, layout planning, and infrastructure routing. This signifies a failure to adhere to the established mitigation hierarchy, which limits the ability of the competent authority to determine whether less harmful and more suitable alternatives are available. In the absence of a thorough assessment of alternatives, one cannot ascertain that the proposal represents a sustainable or compliant approach in line with policy requirements.

From the standpoint of policy adherence, this inadequacy undermines compliance with National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and the wellbeing of the community. The failure to provide a structured and comparative evaluation constitutes a significant omission, contributing to the overall conclusion that the application has not undergone sufficient assessment and cannot warrant a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The development is situated within key foraging areas and migratory pathways along the west coast of the Isle of Lewis, which supports internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with the application is materially flawed, featuring significant gaps in evidence and internal inconsistencies that undermine its conclusions. The application fails to convincingly demonstrate that these species will not be adversely affected, particularly in relation to displacement, collision risk, and habitat loss.

There is a fundamental contradiction in the application, as the developer concludes there are no significant adverse effects while also advancing a Habitats Regulations derogation case, which is necessary only if significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that

the conclusions drawn are not adequately supported by the evidence presented. 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 has not been fully recognised, and the reliance on modelling approaches introduces uncertainty, especially for species like Kittiwakes and Fulmars, which are in severe decline. The methodologies used are likely to underestimate mortality, particularly where baseline data is lacking and the behavioural responses of the species are not fully understood.

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

From a regulatory standpoint, the application fails to meet the necessary evidential threshold to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle and prevents a lawful conclusion in support of consent. Moreover, the deficiencies identified 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 insufficient evidence. These shortcomings hinder a robust evaluation of impacts and contribute to the overarching conclusion that the application does not satisfy the statutory requirements essential for its determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed, failing to acknowledge the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are deeply intertwined. It adopts a simplistic viewpoint, treating heritage as mere isolated assets rather than recognising their ongoing social, cultural, and spiritual relevance to the community.

A significant shortcoming is the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active sites of burial and spiritual practice, yet the assessment inaccurately categorises them as static features, neglecting their continued significance and the implications of development on their surroundings. This mischaracterisation leads to an incomplete understanding of cultural effects and disregards their importance in community life.

Moreover, the application overlooks intangible cultural heritage elements, including the

Gaelic language and traditions, as well as the long-standing connection between the community and the coastal environment. These factors are vital to the area's identity but are conspicuously absent from the assessment, representing a serious omission. Without acknowledging these aspects, the cultural impact of the development cannot be accurately gauged.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population holds a distinct cultural identity, recognised as that of an Indigenous People; however, no Free, Prior and Informed Consent process has been followed. This lack of meaningful engagement undermines the assessment's credibility and fails to adhere to established principles of participation in matters affecting cultural and environmental interests.

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

From a policy standpoint, these deficiencies place the proposal in direct opposition to the National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with the disregard for living cultural practices, clearly deviates from policy requirements.

Collectively, the neglect to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a robust basis for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

Environmental Impact Assessment process.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

Moreover, there are concerns regarding the methodology used to select and present visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of the visual impact has been understated, thereby undermining the reliability of the assessment.

Another deficiency is the lack of assessment of the interconnectedness between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are part of a wider landscape setting linked visually and spatially to the Atlantic horizon. The assessment treats these as isolated assets

without recognising their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

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

From a policy perspective, the proposal conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is not compatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The absence of a robust worst-case assessment further weakens any assertion of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal entails significant seabed preparation and installation activities in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is inadequate, lacking the necessary detail to assess the potential environmental impacts. Notably, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans, which results in a reliance on mitigation and contingency measures that are to be formulated post-consent. This approach hinders any meaningful evaluation of their potential effectiveness or adequacy.

Given the sensitivity of the receiving environment, this reliance on unspecified future measures raises serious concerns. The West Lewis coastline is home to clean coastal waters and significant habitats that are particularly susceptible to sediment disturbance and contamination. The application identifies risks, including sediment mobilisation and possible chemical or oil spills, yet fails to provide comprehensive details on preventative, control, or monitoring strategies for these risks.

Moreover, there is considerable uncertainty surrounding the scale and behaviour of sediment plumes generated by seabed disturbance and cable installation. In the absence of thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also affects potential repercussions for marine species and

habitats that have already been recognised as vulnerable within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application obstructs the assessment of whether adequate safeguards are in place for responding to pollution incidents. This introduces procedural risks and weakens the competent authority's capacity to evaluate environmental protection measures before making a determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements stipulated by the Environmental Impact Assessment framework. It is essential that likely significant effects and mitigation strategies are evaluated prior to consent. The absence of this information renders a lawful determination impossible. Furthermore, the application does not adequately demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the deficiencies in defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts collectively render the assessment materially incomplete. These shortcomings impede a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is not sufficiently robust.

FISHERIES AND MARINE LIFE

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

A crucial concern lies in the erroneous assumption that fishing activities can be displaced without repercussions. The application lacks evidence to support the availability, accessibility, or capacity of alternative fishing grounds to sustain additional pressure. This notable absence poses a considerable risk of overfishing in different areas, which may have broader economic ramifications for the local fleet. The absence of a clear and evidence-based assessment renders the impacts on fisheries and local livelihoods difficult to understand.

Moreover, the proposal introduces considerable risks to marine species, particularly due to the underwater noise produced during construction. The extended high-energy hammer piling is expected to create disturbances over extensive distances, affecting various species including dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises substantial concerns; however, the application minimises the importance of these effects, lacking adequate supporting

evidence.

The application presents a contradiction by acknowledging the necessity for licences to permit harm to European Protected Species while simultaneously claiming that the impacts are negligible. This inconsistency undermines the credibility of the assessment and raises issues regarding adherence to the Habitats Regulations, especially where harm is expected to a degree that necessitates legal authorisation.

Furthermore, the assessment does not adequately address cumulative impacts that arise from multiple pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it remains impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed project is fundamentally flawed, particularly concerning the evaluation of onshore infrastructure. It fails to address the full scope of impacts that arise from what constitutes a single integrated project. The assessment of the offshore turbines and onshore works is conducted separately, resulting in a disjointed approach that obscures the true magnitude of environmental and socio-economic consequences.

Onshore activities encompass cabling through protected moorland, the construction of a substation in proximity to Stornoway, and the establishment of associated access infrastructure across sensitive landscapes. Such works involve the excavation of deep peat areas, especially within Barvas Moor, which serves as a significant carbon reservoir and is an ecologically sensitive habitat. The application lacks a thorough evaluation of these impacts, thus hindering a complete understanding of the overall environmental footprint of the project.

The proposal raises serious concerns regarding carbon balance, as the disturbance of peatland can release stored carbon, leading to a potential carbon debt that contradicts the principles of renewable energy development. The application does not sufficiently address this matter nor does it demonstrate that the overall carbon balance remains advantageous. Furthermore, the routing of infrastructure through active croft land

poses potential conflicts with existing land use and legal rights. The application does not supply evidence that the requisite consents or processes have been initiated, which calls into question the deliverability and lawful implementation of the project.

Moreover, the absence of a comprehensive assessment prevents an accurate evaluation of cumulative effects, which is required under the Environmental Impact Assessment process. The separation of offshore and onshore components means that the combined impacts on peatlands, habitats, and communities remain inadequately understood. There are considerable risks to sensitive habitats, including machair systems and peatland environments, which are under policy protection. The application fails to demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been adopted, resulting in a clear evidential gap concerning biodiversity protection.

From a policy standpoint, the failure to consider the project in its entirety and to show protection of peatlands, habitats, and land use interests contravenes the National Marine Plan and the National Planning Framework 4. The inability to prove that impacts can be effectively avoided or mitigated further weakens the application. Collectively, the separation of project elements, lack of a comprehensive assessment, and insufficient evidence regarding environmental and land use impacts render this section of the application incomplete and unreliable, thus obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal lacks any assessment of dark skies and nocturnal wildlife, which is a significant oversight in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which play a vital role in the environmental quality, cultural identity, and tourism appeal of the area. The introduction of permanent red aviation lighting, which will be visible over long distances, will create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

The application does not evaluate how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. This is especially important considering the relevance of dark skies to the area's identity and the growth of tourism sectors such as astro-tourism. The failure to address these impacts represents a clear gap in the overall assessment of the landscape and environment.

Moreover, there is no analysis of how nocturnal wildlife will be affected. Certain species, including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, are particularly sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application does not contain any lighting impact assessment or phototaxis study, failing to evaluate the effects of aviation lighting on these species or their mortality rates.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and associated risks. Species like

Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The absence of specific night-time data creates a critical lack of understanding regarding ecological impacts.

Without assessing the nocturnal effects, it is impossible to ascertain whether protected species or designated sites would be negatively impacted. The required standard of evidence to rule out adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful determination.

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

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

SUMMARY

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

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

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

Furthermore, the proposal contradicts the National Planning Framework 4, failing to demonstrate biodiversity protection, acceptable health and wellbeing impacts, or net economic benefits, as there is no tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements has not been adequately

conducted, leaving unclear effects on peatlands, carbon balance, habitats, and crofting land.

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

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

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

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

Additional Comments

Generation of electricity should be built closer to the end user. Reducing transmission requirements and overall costs especially those required to not produce. This is in the wrong place and by the wrong people. Profit seeking organisations should not be allowed to step into an area and destroy habitat and beauty belonging to all. This is wrong, nothing is right about 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: 8FF1C413

Member of the public 903

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 comprehensiveness and fails to deliver a transparent and reliable analysis of the potential environmental consequences of the proposed development. By employing a flexible Project Design Envelope that lacks concrete commitments to specific turbine dimensions, layouts, or configurations, the report introduces considerable uncertainty. This approach

obstructs the consistent application of a worst-case scenario analysis, thereby undermining the integrity of the assessment. Consequently, the impacts indicated may not accurately represent the actual development that will be constructed, which in turn hinders both public understanding and the competent authority's capacity to grasp the full extent of environmental implications.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives is fundamentally inadequate and fails to satisfy the statutory requirements of the Environmental Impact Assessment regime. The application does not provide a structured and reasoned comparison of realistic alternatives based on environmental effects; instead, it offers a narrative of project evolution. This method does not demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

Furthermore, there is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has seriously considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be diminished. The sensitivity of the West Lewis coastline and the crucial role of proximity to shore in determining impact mean that the absence of such an analysis precludes any conclusion that the proposed siting is the least damaging option.

These shortcomings also extend to cable routing and landfall assessment, with insufficient evidence that alternative routes have been adequately explored to avoid or mitigate impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis indicate that mitigation by design has not been implemented, relying instead on post-design measures.

Consequently, the application fails to demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This represents a neglect of the established mitigation hierarchy, which prevents the competent authority from determining whether less harmful and more suitable alternatives are available. Without a thorough assessment of alternatives, it cannot be established that the proposal is a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the development's impact on ornithology is fundamentally flawed, characterised by significant gaps in evidence and internal contradictions that undermine its conclusions. Notably, the development is located within crucial foraging areas and migratory pathways. However, the assessment fails to adequately evaluate the implications of displacement, collision risk, and habitat loss on seabird populations, which are already in decline, particularly along the west coast of the Isle of Lewis, known for its internationally important seabird populations.

There exists a critical inconsistency in the application, where the developer claims no significant adverse effects while also pursuing a Habitats Regulations derogation case. This is only necessary when significant harm is anticipated, casting doubt on the reliability of the assessment and suggesting that the conclusions drawn are not sufficiently supported by evidence. The application does not provide adequate evidence regarding the protection of seabirds associated with sites such as the Lewis Peatlands and St Kilda. The assessment inadequately considers the importance of these feeding grounds, relying on modelling techniques that introduce uncertainty, particularly for species like Kittiwakes and Fulmars, which are experiencing severe declines. Such methodologies likely underestimate mortality risks, especially given the incomplete baseline data and unclear behavioural responses.

The placement of turbines within a recognised migratory corridor creates a significant

risk by acting as a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of ongoing mortality within this corridor, as well as the potential impacts on species with relatively small global populations, are not sufficiently assessed in the application.

From a regulatory standpoint, the application does not satisfy the evidential threshold required to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, alongside gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This engages the precautionary principle, hindering a lawful conclusion in favour of consent. Additionally, these deficiencies indicate a failure to comply with National Planning Framework 4, particularly concerning biodiversity protection and safeguarding 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, these combined shortcomings result in an unreliable assessment due to internal inconsistencies, methodological weaknesses, and inadequate evidence. Such deficiencies impede a robust evaluation of the impacts and lead to the conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment conducted on the cultural heritage and community identity is significantly flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community intertwine. This application adopts a simplified view, treating heritage as a collection of isolated, static assets rather than acknowledging their ongoing social, cultural, and spiritual relevance within the community.

A notable shortcoming is evident in the handling of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual engagement, yet the assessment categorises them merely as static features, overlooking their continued use, significance, and the potential impact of development on their surroundings. This misrepresentation leads to an inadequate understanding of cultural effects and dismisses their vital role in community life.

Moreover, the assessment neglects intangible cultural heritage, such as the Gaelic language, traditions, and the enduring bond between the community and the coastal environment. These aspects are crucial to the area's identity but are entirely omitted from the evaluation, representing a considerable gap. The cultural implications of the development cannot be fully grasped without considering these essential elements.

Concerns also arise regarding community rights and participation. The Gaelic-speaking population, recognised for its distinct cultural identity akin to that of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. The lack of meaningful engagement calls into question the credibility of the assessment and

fails to align with established principles for participation in decisions that influence cultural and environmental matters.

Additionally, there is a critical procedural oversight in the failure to complete a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the relevant authority cannot meet its legal obligation to assess the social, cultural, and economic effects on the island community. This absence alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to acknowledge both tangible and intangible heritage, alongside a disregard for living cultural practices, signifies a clear deviation from policy expectations.

In summary, the collective neglect to evaluate living heritage, intangible cultural value, community rights, and statutory duties creates a substantial evidential gap. The cultural consequences of the development have not been adequately examined, leaving the application without a solid foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The application demonstrates a significant deficiency in the assessment of social impacts, health, and wellbeing, lacking the necessary transparency for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This omission creates a considerable evidential gap, obstructing both public understanding and the competent authority's ability to grasp the complete range of social risks highlighted by the developer’s research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These adverse effects stem from direct engagement with the community and are not speculative in nature. However, the lack of disclosure regarding the full assessment hinders proper scrutiny of these findings and limits the capacity to assess their significance in the decision-making process.

Furthermore, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with the developer’s own findings acknowledging a “cultural loss.” Despite this recognition, these impacts have not been adequately integrated into the main application or given appropriate consideration. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency has serious implications for the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for projects of this scale, especially where the character and

functioning of the community may be at stake. The failure to present the full dataset means that the application does not provide a complete evidential basis for weighing the benefits against the harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments are required to support positive health outcomes and mitigate harm; however, the evidence currently available points to existing adverse effects that have not been fully disclosed. Without the complete assessment, it is impossible to demonstrate compliance with this policy.

The procedural ramifications are considerable. The competent authority is unable to carry out a comprehensive socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a material omission in the application and a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation obstructs lawful determination and reinforces the assertion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development involves the installation of large-scale turbines close to the West Lewis coastline. This area is characterised by its open Atlantic horizon, undeveloped nature, and a significant sense of remoteness. The introduction of such industrial structures would create a continuous presence that fundamentally changes the landscape, leading to a permanent and irreversible transformation.

The application does not sufficiently represent the extent of the visual change associated with this proposal. Given the scale and proximity of the turbines, they are likely to dominate views from residential areas, historic sites, and popular coastal locations. This situation would adversely affect visual amenity and undermine the qualities of naturalness and remoteness that define the area. The assessment fails to convey the true level of impact or its significance within this sensitive landscape.

Concerns also arise from the methodology used to select and present visual viewpoints. There is evidence suggesting that these viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly regarding important cultural heritage sites and high-value landscapes. This shortcoming raises the risk that the visual impact has been underestimated, which calls into question the reliability of the assessment.

Additionally, the assessment neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape

context, linked visually and spatially to the Atlantic horizon. The evaluation treats these sites as isolated rather than recognising their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, altering the context in which these heritage assets are experienced and severing their connection to the natural horizon. This represents not just a visual impact but also a broader cultural and spatial harm that has not been adequately assessed.

From a policy standpoint, the proposal contradicts National Planning Framework 4 in terms of protecting natural places and historic assets. The extent of the proposed change is incompatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a robust worst-case assessment undermines any claims of compliance with policy requirements.

Moreover, it is evident that the impacts identified cannot be effectively mitigated. Due to the size, height, and proximity of the turbines, their presence would be both dominant and unavoidable. Consequently, the resulting changes would be fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation measures.

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

CONSTRUCTION AND POLLUTION RISKS

The concerns surrounding the proposal stem from an incomplete assessment of construction and pollution risks, which fails to provide the necessary detail to evaluate potential environmental impacts. The project entails significant seabed preparation and installation activities in a high-energy Atlantic environment, yet lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be established after consent, which prevents any meaningful assessment of their potential adequacy or effectiveness.

This reliance on undefined future measures is especially alarming given the sensitivity of the West Lewis coastline, which is home to clean coastal waters and important habitats vulnerable to sediment disruption and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not furnish adequate detail on the prevention, control, or monitoring of these threats.

There is considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from the seabed disturbance and cable installation. Without rigorous modelling and well-defined management strategies, it is impossible to ascertain the

extent, duration, or ecological repercussions of these impacts. This uncertainty also extends to potential effects on sensitive marine species and habitats identified in the broader assessment.

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

Regulatory requirements highlight that the deferral of essential environmental safeguards contradicts the Environmental Impact Assessment regime. It is crucial that likely significant effects and mitigation strategies be assessed before consent is granted, and the absence of such information renders a lawful determination unattainable. Furthermore, the application does not demonstrate compliance with policy stipulations pertaining to 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 hinder a robust evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

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

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

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

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

From a policy standpoint, the application fails to demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It does not adequately show that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity. This lack of compliance hinders any conclusion that the proposal constitutes sustainable development.

In summary, the deficiencies in the assessment—including the lack of evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal contradictions—render it incomplete and unreliable. These shortcomings impede a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal includes onshore infrastructure that is assessed separately from offshore turbines. This fragmented approach fails to capture the full extent of impacts from what is a single integrated project. The onshore elements consist of cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and ecologically sensitive habitat. The application does not provide a thorough assessment of these impacts, limiting the understanding of the project's overall environmental footprint.

By deferring the assessment of onshore impacts, the application undermines the evaluation of cumulative effects. The Environmental Impact Assessment process requires all project components to be considered together. However, by treating the offshore and onshore elements separately, the combined effects on peatlands, habitats, and local communities are not fully comprehended.

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

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

Moreover, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, which raises questions about its feasibility and legality.

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 in conflict with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed development lacks a crucial assessment of dark skies and nocturnal wildlife, which is a significant oversight within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which contribute to the area's environmental quality, cultural identity, and tourism value. However, the introduction of permanent red aviation lighting, visible over extensive distances, would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

Moreover, the application fails to evaluate the effects of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This oversight is particularly concerning given the importance of dark skies to the region's identity and to emerging tourism sectors, such as astro-tourism. The lack of consideration for these impacts creates a substantial gap in the overall landscape and environmental assessment.

The application also neglects to assess the 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 can lead to disorientation and increased collision risk. Without a lighting impact assessment or a phototaxis study, the application does not address how aviation lighting might affect these species or contribute to mortality rates.

Additionally, the reliance on daytime survey data for the ornithological assessment does not account for nocturnal activity or associated risks. Species such as Kittiwakes,

which may forage or migrate at night, are also susceptible to disorientation from artificial lighting; however, this risk has not been evaluated. The absence of site-specific night-time data creates a critical gap in the understanding of ecological impacts.

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

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

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

TOURISM

The proposed development raises serious concerns regarding its implications for the tourism sector on the Isle of Lewis. Tourism is a crucial component of the local economy, having expanded significantly from £65 million in 2017 to over £81.5 million, and providing support for more than 1,000 jobs while representing up to 16% of the island's economy. Despite this, the application does not adequately assess how the proposed large-scale offshore infrastructure could impact visitor numbers, behaviour, or the overall economic contribution of tourism. The assessment fails to recognise that 86% of visitors are attracted to the area primarily for its scenery.

Moreover, the application neglects to model how the industrialisation of the seascape and degradation of environmental quality could affect Tourism Gross Value Added and the overall resilience of the economy. Without such critical analysis, it remains unclear whether the development could offer any net economic benefit or, conversely, jeopardise a vital and expanding sector.

The evaluation also disregards the importance of environmental quality, particularly unspoiled landscapes and dark skies, which are essential to the visitor experience and burgeoning markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment adds to the deficiencies in the analysis, resulting in a substantial gap in understanding the effects on this increasingly significant part of the local economy.

In an island community with limited economic diversification, the lack of assessment regarding tourism impacts has broader implications for employment, local businesses,

and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that these economic vulnerabilities remain unexamined, in violation of the requirements set forth under the Islands (Scotland) Act 2018.

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

Collectively, the inability to quantify tourism impacts, assess the environmental drivers influencing visitor behaviour, and acknowledge the island's economic reliance results in a significant evidential gap. This gap hinders a thorough evaluation of economic effects and contributes to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the criteria of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. It 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 latest application is now presented within a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis provided by the application is neither complete nor reliable. There are notable deficiencies in baseline data, reliance on an undefined design envelope, and unspecified mitigation measures. Additionally, the application overlooks crucial impact pathways, including those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of potential significant effects and residual impacts.

Furthermore, there are distinct procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties as outlined in the Islands (Scotland) Act 2018. The omission of a comprehensive Social Impact Assessment further compounds these issues, obstructing the competent authority from effectively assessing the impacts on community wellbeing, cultural identity, and economic resilience. These inadequacies are enough to deem the application unsuitable for determination.

The proposal stands in direct opposition to the National Planning Framework 4, failing to demonstrate adequate protection for biodiversity, natural places, and cultural heritage. It does not provide evidence that health and wellbeing impacts are acceptable, nor does it show a net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore components has not been conducted properly, which obscures understanding of

effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are not only uncertain but potentially significant as well. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent with each other. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

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

In light of these numerous and serious concerns, the application is both procedurally and substantively unfit for determination. The scale of information gaps, alongside conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or invoke the appropriate regulatory measures to compel the submission of the missing information.

Therefore, I formally request that the application for the Spiorad na Mara Offshore Wind Farm be 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: A44587DF

Member of the public 904

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with the marine licensing and Environmental Impact Assessment regulations. A thorough review of the Environmental Impact Assessment Report and the accompanying documentation reveals several material deficiencies across planning, environmental, cultural, and procedural aspects. The project is located 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 design of this proposal, alongside its proximity to the shoreline, raise fundamental questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential foundation necessary for a lawful determination. Important environmental data is absent, and the baseline information provided is both limited and inconsistent, leaving key elements of the proposal undefined. The application employs a flexible design framework that obscures an understanding of the likely significant effects, and the reliance on unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, and claims asserting negligible or non-significant effects lack robust supporting evidence.

There are evident and serious conflicts with established policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment process, or National Planning Framework 4, especially concerning biodiversity, cultural heritage, natural places, and public health. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and overall environmental integrity. Such conflicts directly impact the statutory tests needed for consent, undermining the competent authority's ability to deem the development acceptable within policy frameworks.

The unprecedented scale of the proposal introduces large turbines situated near the shoreline, creating significant concerns related to landscape capacity, visual dominance, and overall environmental impact. In light of the insufficient information provided, the reliance on undefined mitigation measures, evidential shortcomings, and apparent policy non-compliance, it is clear that the application is incomplete and cannot support a lawful determination. In these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is unreliable and incomplete, failing to provide a full, transparent, or reliable account of the likely environmental effects of the proposal. The introduction of a flexible Project Design Envelope, lacking commitment to specific turbine dimensions, layouts, or configurations, introduces substantial uncertainty and hinders a consistent application of a worst-case scenario. This compromises the integrity of the assessment, preventing both the public and the competent authority from comprehending the true extent of environmental impacts.

Consent is sought based on mitigation measures, monitoring strategies, and management plans that remain undefined. This deferral means that environmental harm is expected to be addressed post-consent, inhibiting any meaningful evaluation of effectiveness or assessment of residual impacts. Such a process is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established prior to determination.

Significant evidential deficiencies also exist, including gaps in baseline data, limitations in methodology, and reliance on assumptions instead of site-specific evidence. This results in uncertainty regarding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

Consequently, the application does not meet the evidential threshold necessary under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This engages the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it has not been shown that impacts have been fully assessed or that appropriate safeguards are in place.

In conclusion, the combination of an undefined design envelope, absence of specified mitigation, and gaps in baseline data renders the Environmental Impact Assessment Report fundamentally flawed. These deficiencies obstruct a lawful and robust assessment of environmental effects and place the competent authority in a position where it cannot adequately determine the application based on the information available.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species fails to provide a complete or reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is a highly sensitive and biologically active marine system. However, the baseline data is incomplete, and the methodologies applied do not adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a sound evidential basis for evaluating impacts.

A significant omission is related to otters, a European Protected Species. The application does not properly recognise or assess their active use of coastal areas for foraging and movement. The oversight regarding their core foraging range and behavioural patterns means that the potential effects of construction disturbance, noise, and increased activity have not been adequately assessed, undermining any conclusions about the absence of significant effects on this species.

In addition, the assessment of basking sharks is deficient. The reliance on aerial surveys introduces significant detection bias, particularly under Atlantic conditions. This approach is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or properly consider such data results in an incomplete baseline, weakening the reliability of the conclusions presented.

These methodological limitations lead to conclusions of negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of sufficient baseline data also hampers meaningful assessment of cumulative and indirect impacts, including seasonal variation and interactions within the wider ecosystem. This creates uncertainty about the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not meet the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or assessed. The level of uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, engaging 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 hinder a robust evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant contradictions that undermine its credibility, notably the developer's assertion of no significant adverse effects while simultaneously arguing for a Habitats Regulations derogation. This derogation is only pertinent where there is an expectation of substantial harm, casting doubt on the reliability of the assessment and suggesting that the conclusions are not well-supported by the evidence provided. Furthermore, the ornithological assessment is critically flawed, revealing substantial gaps in evidence and internal inconsistencies.

The west coast of the Isle of Lewis is home to internationally important seabird populations that are already in decline, yet the application fails to adequately prove that these species will not be adversely affected. Key foraging areas and migratory pathways, which are crucial for these populations, are not thoroughly evaluated in the

assessment, particularly regarding displacement, collision risk, and habitat loss. The methodologies employed tend to underestimate potential mortality rates, especially given the incomplete baseline data and limited understanding of species' behavioural responses.

Siting turbines within a recognised migratory corridor introduces a severe risk, creating a barrier along 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 sufficiently assessed, nor have the potential effects on species with limited global populations. From a regulatory standpoint, the application does not satisfy the evidential threshold needed to assert that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, along with gaps in data and modelling limitations, means that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle, obstructing a lawful conclusion in favour of consent.

The inadequacies identified also represent a failure to adhere to 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 impacted places the proposal in direct contradiction to national policy. Collectively, these issues render the assessment unreliable, due to its methodological weaknesses and insufficient evidence, preventing a comprehensive evaluation of impacts and leading to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposal is significantly inadequate and lacks the necessary transparency for a lawful evaluation. Although the developer engaged in a Social Impact Assessment, which included focus groups with local residents, the complete report has not been made available. This represents a substantial evidential gap, hindering both public understanding and the competent authority's ability to grasp the full extent of the social risks identified in the developer's own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, with these impacts arising from direct engagement rather than speculation. However, the absence of the full assessment hampers proper scrutiny of the findings and restricts the capacity to assess their significance during the decision-making process.

Moreover, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with the developer's own findings indicating the potential for "cultural loss." Yet, these impacts have not been adequately integrated into the main application or given the necessary weight. The failure to disclose the full Social Impact Assessment thus obscures the true human and social costs of the development.

This lack of transparency also compromises the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is vital for developments of this magnitude, especially when community character and functionality may be at stake. Without providing the complete dataset, the application lacks a robust evidential basis to evaluate the balance between benefits and harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm; however, the available evidence points to existing adverse effects that have not been fully disclosed. Therefore, it cannot be demonstrated that the proposal complies with this policy in the absence of the complete assessment.

The procedural ramifications are substantial, as the competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This omission is a material flaw within the application and represents a failure to meet the evidential standards set by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation impedes a lawful determination and reinforces the conclusion that the application is not substantiated by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application for large-scale turbines along the West Lewis coastline raises significant concerns regarding its impact on the local landscape, seascape, and cultural heritage. The introduction of these turbines would lead to a dominant industrial presence that fundamentally changes the area's character, known for its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. This alteration to the landscape is not only substantial but also permanent and irreversible.

The visual impact of the turbines is inadequately represented in the assessment. Due to their scale and proximity to residential areas, historic sites, and popular coastal locations, the turbines would dominate views and severely impact visual amenity. This change erodes the defining qualities of naturalness and remoteness, yet the assessment fails to convey the full significance of this impact within such a sensitive landscape.

Methodological shortcomings are evident in the selection and presentation of visual viewpoints. It appears that the chosen viewpoints do not fully encapsulate the sensitivity of key cultural heritage sites and high-value landscapes. Consequently, the potential visual impact may have been understated, leading to a less reliable assessment.

Additionally, the application neglects to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. Treating these assets as isolated fails to acknowledge their interdependence, resulting in an inadequate evaluation of the impacts on their setting and cultural significance.

The potential industrialisation of the seascape threatens to sever these vital connections, disrupting the context in which heritage assets are experienced. This change represents not merely a visual impact but a wider cultural and spatial harm that remains insufficiently assessed in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, which aims to protect natural places and historic assets. The significant scale of change proposed is incompatible with the requirements to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Moreover, the lack of a robust worst-case impact assessment undermines any assertion of compliance with established policies.

It is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence is dominant and unavoidable. Thus, the changes brought about would be fundamental and permanent, beyond the scope of acceptable reduction through mitigation.

In summary, the assessment provided is inadequate in accurately portraying the scale of impact, the sensitivity of the receiving environment, and the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal cannot be reconciled with the protection of this significant landscape.

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 assessment fails to provide a thorough evaluation of fisheries and marine life, lacking a robust analysis 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 habitats and activities can be safeguarded from significant disruption.

A critical flaw lies in the assumption that fishing activities can be displaced without repercussions. The application lacks evidence to suggest that alternative fishing grounds are available, accessible, or capable of accommodating additional pressure. This significant oversight increases the risk of overfishing in other areas, which could have broader economic repercussions for the local fishing fleet. Without a sound and evidence-based evaluation, the effects on fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise associated with construction activities. The use of high-energy hammer piling for an extended duration is expected to cause disturbances over large distances, negatively impacting species such as dolphins. The anticipated disruption to a considerable proportion of the local bottlenose dolphin population raises serious concerns; yet, the application minimizes the significance of these effects without adequate supporting evidence.

There is a notable inconsistency in the application, which acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously characterising these impacts as negligible. This contradiction undermines the reliability of the assessment and raises questions about adherence to the Habitats Regulations, especially where harm is expected to a degree that warrants legal authorisation.

Furthermore, the assessment overlooks the cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential, as it is critical to understanding the overall impact on marine ecosystems and socio-economic conditions.

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

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

SUMMARY

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

There are significant gaps in the baseline data provided, reliance on an undefined design envelope, unspecified mitigation measures, and crucial omissions regarding impact pathways, including those affecting nocturnal wildlife, the full extent of onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of the likely significant effects or residual impacts.

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

economic resilience, rendering the application unfit for determination.

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

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 37657EA7

Member of the public 905

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 applicable marine licensing and Environmental Impact Assessment regimes. Upon reviewing the Environmental Impact Assessment Report and its accompanying documentation, several deficiencies have been identified that relate to planning, environmental considerations, cultural aspects, and procedural integrity. The proposed development is situated off the west side of the Isle of Lewis, an area celebrated for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. There are significant concerns regarding the compatibility of the proposal's scale, proximity, and design with statutory requirements, national policy, and sustainable development principles.

The application does not present a sufficiently evidential basis to facilitate a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many key aspects of the proposal remain undefined, which hinders a thorough understanding of the likely significant effects. The reliance on a flexible design framework and unspecified mitigation measures prevents the assessment of their effectiveness, leading to an incomplete picture of the potential environmental, cultural, or community impacts. Consequently, claims of negligible or non-significant effects lack robust evidential support.

There are also significant policy conflicts evident within the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly in terms of biodiversity, natural habitats, cultural heritage, and health and wellbeing. The application fails to convincingly demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts are critical as they undermine the ability of the competent authority to ascertain that the development aligns with policy objectives.

The scale of the proposed wind farm is unprecedented for this area, with large turbines positioned in proximity to the shoreline, raising substantial concerns regarding landscape capacity, visual dominance, and overall environmental impact. In summary, the lack of sufficient information, reliance on undefined mitigation strategies, evidential inadequacies, and clear policy non-compliance collectively indicate that the application is incomplete and fails to support a lawful determination. In light of these issues, it is essential that the precautionary principle is applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species associated with the application is significantly flawed, lacking a comprehensive and reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is known for its high sensitivity and biological activity, yet the baseline data is insufficient, and the applied methodologies do not adequately capture key factors such as species presence, behaviour, and habitat use. Consequently, the assessment falls short of providing a solid evidential foundation necessary for impact evaluation.

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The 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 assessment concerning cultural heritage and community identity lacks depth and fails to recognise the West Lewis coastline as a vibrant cultural landscape, where

environment, language, tradition, and community are deeply intertwined. Rather than appreciating heritage as a dynamic aspect of community life, the application reduces it to isolated, unchanging assets. This oversimplification overlooks the ongoing social, cultural, and spiritual significance these elements hold for the community.

Particularly concerning is the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active burial grounds and places of spiritual practice; however, the assessment improperly categorises them as mere static features. This mischaracterisation neglects their continued use and significance, as well as the impact of development on their surroundings. Such an oversight leads to an incomplete understanding of cultural effects and disregards the integral role these sites play in community life.

Moreover, the assessment omits intangible cultural heritage, including the Gaelic language and traditions, alongside the longstanding relationship between the community and the coastal environment. These vital elements are essential to the area's identity yet are entirely absent from consideration, representing a grave oversight. Without acknowledging these aspects, the true cultural ramifications of the proposed development remain inadequately understood.

There are additional concerns regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity akin to that of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement raises questions about the validity of the assessment and contravenes established principles for involving communities in decisions that impact cultural and environmental interests.

A critical flaw in the process is the absence of a compliant Island Communities Impact Assessment, required by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal responsibilities to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

These shortcomings directly conflict with the National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, alongside the failure to acknowledge living cultural practices, signifies a clear deviation from policy requirements.

In summary, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application lacking a sufficient basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is deeply concerning, as it significantly hampers the ability of the public and relevant authorities to comprehend the social risks identified through the developer's own investigations. Although the developer conducted focus groups with local residents, the failure to publish the full report creates a considerable evidential gap. This deficiency restricts proper scrutiny of the findings, thereby limiting the understanding of their importance in the decision-making process.

Residents have already reported experiencing notable stress, anxiety, and concern related to the scale and proximity of the proposal. These impacts stem from direct engagement with the community, making them grounded in reality rather than speculation. Additionally, the proposal appears to threaten community identity and cohesion, with findings from the developer indicating the possibility of "cultural loss." Unfortunately, these significant impacts have not been adequately addressed in the main application, resulting in a lack of appropriate consideration.

Furthermore, the withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development. Such omissions undermine the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health impacts is essential for projects of this nature, particularly when they could affect community character and functionality. Without the full dataset, the application presents an incomplete evidential basis to assess the balance between benefits and detriments.

From a policy standpoint, the application falls short in demonstrating compliance with National Planning Framework 4 concerning health and wellbeing. Development should foster positive health outcomes and mitigate harm; however, the evidence available suggests existing adverse effects that remain undisclosed. Consequently, it cannot be established that the application complies with this essential policy in the absence of the complete assessment.

The procedural ramifications of this situation are significant. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This constitutes a material omission within the application and fails to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, alongside evidence of current negative impacts, leads to an incomplete and unreliable assessment. This ultimately obstructs a lawful determination, reinforcing the view that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would create a continuous

industrial presence that fundamentally alters this character, resulting in a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient, as it fails to adequately reflect the scale of change or the sensitivity of the receiving environment.

The application does not accurately convey the magnitude of the visual change. The scale and proximity of the turbines mean they would dominate views from residential areas, historic sites, and frequently used coastal locations. This dominance would directly impact visual amenity and erode the defining qualities of naturalness and remoteness. The assessment does not sufficiently communicate the significance of this impact within such a sensitive landscape context.

Methodological concerns arise regarding the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the risk that the magnitude of the visual impact has been understated, thereby undermining the reliability of the assessment.

Another significant shortcoming is the failure to assess the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a wider landscape setting, visually and spatially linked to the Atlantic horizon. Treating these as isolated assets instead of recognising their interdependence leads to an incomplete evaluation of the impacts on their setting and cultural significance. The industrialisation of the seascape would sever these relationships, altering the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This presents not only a visual impact but also broader cultural and spatial harm that the application has not sufficiently assessed.

From a policy perspective, the proposal directly conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the absence of a robust worst-case assessment undermines any claims of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposed development involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is lacking in detail, failing to provide the necessary information to evaluate potential environmental impacts. The application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans, instead relying on mitigation and contingency measures that are to be established after consent. This approach inhibits any meaningful assessment of their adequacy or effectiveness.

There is particular concern over this reliance on undefined future measures, especially considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and essential habitats, both of which 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 sufficiently detail how these risks will be prevented, controlled, or monitored.

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

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning until post-consent, the application obstructs the evaluation of whether adequate safeguards are in place to address pollution events. This introduces procedural risks and diminishes the capability of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements set by the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to granting consent, and when such information is absent, a lawful determination cannot be achieved. The application fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application presents a number of critical deficiencies that undermine its reliability regarding the assessment of fisheries and marine life. It fails to provide a comprehensive evaluation of the ecological and socio-economic impacts associated

with the proposal. The waters off the West Lewis coast are home to both a thriving marine ecosystem and an active fishing industry, yet the application does not demonstrate how these essential uses and habitats will be preserved or maintained without significant disruption.

A major concern arises from the assumption that fishing activities can be displaced without repercussions. The application lacks evidence to support the availability and accessibility of alternative fishing grounds that could withstand any additional pressure. This significant omission raises the risk of overfishing in other areas, which may lead to wider economic implications for the local fishing fleet. Without a clear, evidence-based assessment, the true impacts on fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable risks to marine species, particularly due to underwater noise resulting from construction activities. The use of high-energy hammer piling over an extended period threatens to disturb marine life across considerable distances, particularly affecting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application minimises the importance of these effects without adequate supporting evidence.

There is also a notable inconsistency within the application, as it acknowledges the need for licences to permit harm to European Protected Species while concurrently describing the anticipated impacts as negligible. This contradiction raises serious questions about the credibility of the assessment and its alignment with the Habitats Regulations, especially in cases where anticipated harm necessitates legal authorisation.

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

From a policy standpoint, the application fails to demonstrate compliance with the 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 effects on marine biodiversity, thereby preventing any conclusion that the proposal aligns with the principles of sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and does not capture the full range of impacts from what is effectively a single integrated project. The offshore turbines and onshore works are inherently interconnected, yet their separate assessments lead to a fragmented understanding that clouds the true extent of the environmental and socio-economic consequences.

Onshore elements encompass cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, especially within Barvas Moor, a vital carbon store and ecologically important habitat. Without a thorough evaluation of these impacts, it is impossible to grasp the overall environmental footprint of the project.

By neglecting to assess the onshore impacts or postponing that evaluation, the application hampers the analysis of cumulative effects. The Environmental Impact Assessment process demands that all aspects of a project be reviewed in tandem, yet the disjointed examination of offshore and onshore components obscures the combined impacts on peatlands, habitats, and local communities.

Furthermore, there are serious risks to sensitive habitats, including machair systems and peatland areas, which are protected by policy. The application fails to demonstrate that the impacts on these habitats have been thoroughly evaluated or that effective avoidance measures have been implemented. This results in a significant evidential gap regarding biodiversity protection.

Concerns also arise about the carbon balance associated with the proposal. Disturbance of peatland releases stored carbon, potentially incurring a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this matter or prove that the overall carbon balance remains favourable.

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

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

The combination of separating project components, the lack of a thorough assessment, and insufficient evidence regarding environmental and land use impacts makes this part of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in defining environmental quality, cultural identity, and tourism potential. The absence of an assessment regarding dark skies and nocturnal wildlife in the Environmental Impact Assessment represents a significant gap. The proposal introduces permanent red aviation lighting that will be visible over long distances, resulting in a persistent and disruptive “wall of light” effect across the western horizon. This change would fundamentally alter the night-time landscape.

Moreover, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. The significance of dark skies in relation to the area’s identity and the emerging sector of astro-tourism cannot be overstated. Without proper assessment, this omission leaves a crucial void in understanding the landscape and environmental implications.

The lack of evaluation extends to the impacts on nocturnal wildlife, with no assessment of how artificial lighting may affect species like the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, all of which are susceptible to phototaxis, potentially leading to disorientation and a heightened risk of collisions. The application does not include any lighting impact assessment or phototaxis study, resulting in a failure to consider the effects of aviation lighting on these species and their potential mortality.

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

Without a thorough assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would face adverse impacts. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and hindering a lawful determination.

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

In summary, the absence of any assessment related to dark skies and nocturnal wildlife constitutes a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis means the application is incomplete and cannot support a lawful determination.

SUMMARY

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

statutory duties, and evidential standards. This situation mirrors the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. The current application, although framed within a stronger policy context that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, does not substantiate its claims.

There are significant deficiencies in the evidential basis for the application, including critical gaps in baseline data and the use of an undefined design envelope. Furthermore, it relies on unspecified mitigation measures and fails to address key impact pathways, such as those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism impacts. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

The application also suffers from procedural inadequacies. Notably, the lack of a compliant Island Communities Impact Assessment is a breach of statutory duty as stipulated under the Islands (Scotland) Act 2018. Additionally, the omission of the complete Social Impact Assessment represents a material shortfall. 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 stands in direct opposition to National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural landscapes, and cultural heritage. It fails to illustrate acceptable health and wellbeing impacts and cannot provide evidence of net economic benefits, particularly due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been properly assessed, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially severe. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies. The evidential standard needed to rule out adverse effects beyond reasonable scientific doubt has not been achieved, engaging the precautionary principle and barring a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is fundamentally unfit for determination both procedurally and substantively. The extensive information gaps, combined with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision-making process. The competent authority must either refuse consent based on these grounds or invoke the appropriate regulatory provisions to require the submission of the

missing information.

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

Additional Comments

I find it very concerning that this development is even being considered for our wonderful little island. I mean why put a wind farm, in the windiest place in the UK. We often have wind speeds of above 55mph, ,so I fail to see how this will be considered effective, only to the electric companies who will be handsomely recompensed by the government, every time they are switched off. The effect on our island will be disruptive and our wee islands roads will be damaged by tbe large vehicles required to carry the infrastructure to complete the project and then in years to come, the view of these broken down , rusted out usless pylons will inevitably impact on the tourism that is the life blood to many of us island residents. I suppose its another way of clearing yet another island of its residents and its culture.

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: 4A95C09E

Member of the public 906

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 grounded in a thorough review of the Environmental Impact Assessment Report and its supporting documentation, revealing significant deficiencies across various dimensions, including planning, environmental, cultural, and procedural aspects. 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 from the scale and design of the proposal, particularly regarding its adherence to statutory requirements, national policy, and the principles of sustainable development.

The application lacks a solid evidential foundation necessary for a lawful determination. Key environmental data is absent, baseline information is inadequate and inconsistent, and crucial elements of the proposal remain undefined. The reliance on a flexible design framework hinders the ability to evaluate likely significant effects, and the unspecified nature of mitigation measures prevents assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by reliable evidence.

Moreover, there are significant conflicts with established 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 adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and overall environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent, compromising the capacity of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal, featuring large turbines positioned close to the shoreline, raises critical concerns about landscape capacity, visual dominance, and environmental consequences. The combination of insufficient information, dependence on undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that undermine its reliability and transparency regarding the likely environmental effects of the proposal. One critical issue is the adoption of a flexible Project Design Envelope, which lacks specific turbine dimensions, layouts, or configurations. This creates considerable uncertainty and hinders a consistent worst-case scenario application. As a result, the impacts outlined may not accurately represent the development as constructed, limiting both public and competent authority understanding of the true environmental effects.

Moreover, the application depends heavily on mitigation measures, monitoring strategies, and management plans that remain undefined. This reliance implies that consent is sought on the premise that any environmental harm will be addressed at a later stage, obstructing a meaningful evaluation of their effectiveness or assessment of residual impacts. The postponement of essential information to post-consent phases is procedurally unacceptable, contradicting the Environmental Impact Assessment regime's purpose, which mandates that significant effects and mitigation measures are clearly established prior to decision-making.

The assessment further suffers from considerable evidential shortcomings, marked by gaps in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. These shortcomings engender uncertainty about the scale and significance of the impacts, especially where negligible or non-significant effects are concluded without substantial supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to meet statutory requirements.

Consequently, the application does not satisfy the evidential standard outlined in the Habitats Regulations, which necessitates excluding adverse effects beyond reasonable scientific doubt. This situation necessitates the application of the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, including obligations concerning biodiversity protection and environmental integrity, as it has not been established that impacts have been fully assessed or that suitable 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 contribute to the unreliability and incompleteness of the Environmental Impact Assessment Report. These deficiencies hinder a lawful and robust evaluation of environmental effects, leaving the competent authority unable to make a well-informed determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a robust assessment of alternatives, which does not comply with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic

alternatives based on their environmental effects, it merely recounts the project's evolution. This narrative approach does not adequately demonstrate that less harmful options have been identified, assessed, and chosen over more damaging solutions.

Furthermore, there is a notable lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Particularly concerning is the absence of evidence that the developer has seriously considered placing turbines further offshore, a decision that would likely lessen visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the crucial role of proximity to shore in assessing impacts, the failure to include such analysis means that the proposed siting cannot be deemed the least damaging option.

The inadequacies extend to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors. This includes areas of cultural and spiritual significance such as Barvas Cemetery. The lack of a clear avoidance strategy and a comparative analysis suggests that mitigation through design has not been effectively implemented, resulting in a reliance on post-design mitigation measures.

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

From a policy standpoint, this deficiency significantly undermines adherence to National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a serious omission that leads to the overall conclusion that the application has not been adequately evaluated and cannot lawfully be determined.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

undermining any conclusions regarding the absence of significant effects on this species.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that compromise its reliability. The development is situated 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 declining. However, the application fails to prove to the necessary evidential standard that these species will not suffer adverse effects.

There are contradictions within the application itself. The developer claims that there will be no significant adverse effects while also putting forward a Habitats Regulations derogation case, which is only required when significant harm is anticipated. This inconsistency casts doubt on the assessment's reliability and highlights that the conclusions drawn are not backed by adequate evidence.

The assessment lacks sufficient evidence regarding the seabirds connected to protected sites such as the Lewis Peatlands and St Kilda. It does not fully account for

the significance of these feeding grounds and relies heavily on modelling approaches that introduce uncertainty, particularly for species facing severe declines like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially since the baseline data is incomplete and the behavioural responses of these species are not thoroughly understood.

The placement of turbines within a recognized migratory corridor adds a significant risk, creating a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of sustained mortality within this corridor or the potential impact on species with limited global populations.

From a regulatory standpoint, the application does not fulfil the evidential threshold required to affirm that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, combined with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, thereby hindering a lawful conclusion in favour of consent.

Moreover, the identified deficiencies signify non-compliance with the National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The failure to demonstrate that internationally important seabird populations will remain unaffected directly conflicts with national policy.

In summary, the assessment is unreliable due to its internal inconsistencies, methodological flaws, and lack of evidence. These issues impede a thorough evaluation of impacts and substantiate the conclusion that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application lacks a comprehensive assessment of community rights and engagement, particularly regarding the Gaelic-speaking population, which embodies characteristics of an Indigenous People. Notably, there has been no process of Free, Prior and Informed Consent conducted, which undermines the legitimacy of the assessment. This absence of meaningful engagement fails to adhere to established principles concerning participation in decisions that affect cultural and environmental interests.

Furthermore, the evaluation of cultural heritage and community identity is fundamentally inadequate, as it overlooks the West Lewis coastline's status as a living cultural landscape, where environment, language, tradition, and community are intrinsically linked. The assessment adopts a reductive perspective, viewing heritage merely as a collection of isolated, static assets and neglecting their ongoing social, cultural, and spiritual significance within the community.

An important deficiency is found in the treatment of culturally significant sites such as

the cemeteries at Dalmore, Bragar, and Barvas. These locations are active sites of burial and spiritual practice; however, the assessment incorrectly categorises them as static features, disregarding their continued use, meaning, and the impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects and neglects their essential role in community life.

The application also fails to consider intangible cultural heritage, including the Gaelic language, traditions, and the longstanding relationship between the community and the coastal environment. These elements are central to the area's identity but are entirely omitted from the assessment, creating a significant gap. The cultural impact of the development remains unclear without the inclusion of these factors.

Moreover, a critical procedural oversight is evident in the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering the determination unlawful.

From a policy standpoint, these shortcomings place the proposal at odds with the National Planning Framework 4, especially regarding the protection of historic assets and places. The failure to adequately address both tangible and intangible heritage, along with the neglect of living cultural practices, is a clear deviation from policy requirements.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the full Social Impact Assessment significantly undermines the integrity of the application. The developer engaged local residents through focus groups as part of the assessment, yet the comprehensive report remains unpublished. This omission creates a critical evidential gap that hinders public understanding and the competent authority's ability to evaluate social risks identified by the developer’s own research.

Available summaries highlight that residents are experiencing measurable stress, anxiety, and concern linked to the scale and proximity of the proposed development. These impacts are based on direct engagement with the community and are not speculative in nature. However, without access to the complete assessment, proper scrutiny of these findings is limited, which restricts the determination of their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal poses a threat to

community identity and cohesion, with “cultural loss” noted in the developer's findings. Despite this, the impacts have not been adequately incorporated into the main application or weighted appropriately. The withholding of the complete Social Impact Assessment obscures the real human and social costs associated with the development.

The implications of this lack of disclosure extend to the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for projects of this magnitude, especially when community character and function may be at risk. The failure to provide the complete dataset results in an application that does not present a comprehensive evidential foundation for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. While development must promote positive health outcomes and mitigate harm, available evidence suggests existing adverse effects that have not been fully revealed. The absence of the full assessment precludes any demonstration of compliance with this policy.

The procedural ramifications of this situation are substantial. The competent authority cannot perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission represents a significant flaw in the application and fails to satisfy 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 existing adverse impacts, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, landscape, and seascape impacts is significantly inadequate. It does not capture the extent of change or the sensitivity of the environment. The West Lewis coastline is characterised by an open Atlantic horizon, a lack of development, and a strong sense of remoteness. Introducing large turbines near the shoreline would create a continuous industrial presence, which would fundamentally change this character and lead to a permanent transformation of the landscape.

The application does not effectively convey the magnitude of the visual changes expected. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would directly affect visual amenity and diminish the naturalness and sense of remoteness that the area currently possesses. The assessment fails to articulate this impact or its importance within such a sensitive landscape.

Methodological issues also arise concerning how visual viewpoints have been selected and presented. It appears that these viewpoints do not fully reflect the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and valued landscapes. This oversight raises the possibility that the visual impact has been underestimated, thereby reducing the reliability of the assessment.

Moreover, there is a notable failure to examine the interconnectedness of landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape linked visually and spatially to the Atlantic horizon. The assessment treats these as isolated features rather than recognising their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering how heritage assets are experienced and diminishing their relationship with the natural horizon. This represents not only a visual effect but also broader cultural and spatial harm that the application has not adequately addressed.

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

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

Overall, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interrelatedness of landscape and heritage. These shortcomings hinder a reliable evaluation and strengthen the argument that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant concerns regarding the completeness of its assessment related to construction and pollution risks, which lacks the necessary detail to evaluate potential environmental effects. Given the substantial seabed preparation and installation works proposed in a high-energy Atlantic environment, there is a notable absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application indicates that mitigation and contingency measures will be formulated after consent, which obstructs any meaningful assessment of their potential adequacy or effectiveness.

This reliance on unspecified future measures raises alarm, particularly when considering the sensitivity of the receiving environment. The West Lewis coastline is

home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application does acknowledge risks like sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on preventive, control, or monitoring strategies.

Moreover, uncertainty persists regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The lack of robust modelling and clearly defined management strategies hampers the ability to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to the potential effects on marine species and habitats already recognised as sensitive in the broader assessment.

The shortcomings in the application are further exacerbated by the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent stage, the application inhibits the evaluation of whether sufficient safeguards are in place to manage pollution events. This introduces procedural risks and undermines the capability of the competent authority to assess environmental protection measures adequately at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the obligations set out in the Environmental Impact Assessment regime. Significant likely effects and necessary mitigation must be evaluated prior to consent, and the absence of such information means that a lawful determination cannot be achieved. Furthermore, the application does not sufficiently demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, detailed management plans, and uncertainty regarding potential impacts create a materially deficient assessment. These deficiencies hinder a comprehensive evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents serious deficiencies in its assessment of fisheries and marine life, which fails to adequately evaluate ecological or socio-economic impacts. The waters off the West Lewis coast are home to both a diverse marine ecosystem and a thriving fishing industry. However, the proposal does not demonstrate that these essential uses and habitats can be preserved without causing significant disruption.

A critical flaw in the application is the assumption that displacing fishing activities will not have consequences. There is a lack of evidence regarding the availability or accessibility of alternative fishing grounds that could support the additional pressure. This gap in the assessment is significant, as it poses the risk of overfishing in other areas and may lead to broader economic ramifications for the local fishing fleet. Without a thorough and evidence-based analysis, the potential impacts on fisheries and the livelihoods of those who depend on them remain unclear.

The proposal introduces notable risks to marine species, particularly due to the underwater noise generated during construction. The prolonged high-energy hammer piling is expected to disturb marine life over large distances, with particular concern for species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious alarms, yet the application downplays these effects without providing adequate supporting evidence.

Moreover, the application contains an internal inconsistency, as it acknowledges the need for licenses to allow harm to European Protected Species while simultaneously describing the impacts as negligible. This contradiction diminishes the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 and the National Marine Plan. It does not establish that the development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, thereby failing to confirm 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 both incomplete and unreliable. These shortcomings inhibit a robust evaluation of the implications for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is significantly lacking and does not fully address the impacts stemming from what constitutes a single integrated project. The interconnection between the offshore turbines and the onshore works is clear, yet these elements are evaluated in isolation, leading to a fragmented analysis that diminishes the understanding of the overall environmental and socio-economic implications.

Included in the onshore components are cabling traversing protected moorland, the construction of a substation in proximity to Stornoway, and the development of access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly on Barvas Moor, which serves as an important carbon reservoir and an ecologically significant habitat. The application fails to provide a thorough assessment of these impacts, hindering a complete understanding of the project's total environmental footprint.

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

Additionally, there are considerable risks to sensitive habitats, including machair systems and peatland environments, both of which are protected by policy. The application does not adequately demonstrate that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, indicating a significant evidential gap concerning biodiversity protection.

The proposal further raises serious concerns regarding carbon balance. Disturbance of peatland results in the release of stored carbon, potentially incurring a carbon debt that contradicts the aims of renewable energy initiatives. The application inadequately addresses this concern and fails to show that the overall carbon balance remains advantageous.

Moreover, the routing of infrastructure across active croft land presents potential conflicts with existing land use and legal rights. There is no evidence within the application that necessary consents or processes have been initiated, which raises doubts about the feasibility and lawful execution of the proposal.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife is a critical shortfall within the Environmental Impact Assessment. The West Lewis coastline boasts particularly dark skies, which play a vital role in the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting will result in a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

There has been no evaluation of the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This is a significant oversight considering the essential nature of dark skies to the identity of the region and the burgeoning sectors of tourism, such as astro-tourism. Consequently, the absence of

these assessments creates a clear void in the overall evaluation of landscape and environmental impacts.

Furthermore, the impacts on nocturnal wildlife remain unexamined. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can lead to disorientation and increased risks of collision. The application does not feature any lighting impact assessment or phototaxis study, failing to evaluate how aviation lighting may impact these species or elevate mortality rates.

The reliance on daytime survey data within the ornithological assessment exacerbates this issue, as it does not capture the nocturnal activity or the associated risks that species such as Kittiwakes face while foraging or migrating at night. The absence of site-specific night-time data creates a significant gap in understanding ecological impacts.

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

From a policy standpoint, this omission contradicts the National Planning Framework 4 regarding the protection of natural places and the maintenance of environmental quality. Additionally, it undermines the wider evaluation of landscape and seascape impacts, as night-time character is a crucial aspect of the environment.

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

TOURISM

The assessment of tourism impacts within the application is fundamentally inadequate, neglecting to evaluate the economic and social ramifications for a vital sector of the Isle of Lewis economy. The success of tourism is intricately linked to the area's wild coastline, near-pristine landscapes, dark skies, and a prevailing sense of remoteness. Notably, the application acknowledges that 86% of visitors are attracted by the scenery; however, it fails to provide a quantified evaluation of how the proposed large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contributions derived from tourism.

This sector has experienced substantial growth, with its value rising from £65 million in 2017 to over £81.5 million, thereby supporting in excess of 1,000 jobs and constituting up to 16% of the island's economy. Despite this impressive growth, the application does not model the potential impacts of industrialisation on the seascape or the

anticipated decline in environmental quality on Tourism Gross Value Added or broader economic resilience. As a result, it remains unclear whether the proposed development would yield a net economic benefit or detract from an established and thriving industry.

Furthermore, the assessment neglects to address the significance of environmental quality in enhancing the tourism experience, particularly highlighting the crucial role of unspoiled landscapes and dark skies in attracting visitors. The absence of a Dark Skies Assessment exacerbates this inadequacy, creating a considerable gap in understanding the impacts on an acknowledged and expanding segment of the local economy, notably nature-based tourism and astro-tourism.

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

From a policy standpoint, the application does not sufficiently demonstrate compliance with the National Planning Framework 4, particularly regarding economic impact and the requisite to establish a net benefit. It stands in opposition to strategic objectives that deem tourism a priority growth sector, lacking the necessary evidence for the competent authority to properly assess the economic consequences of the proposal.

In summary, the combined failures to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and recognise the island's economic dependency culminate in a significant evidential shortfall. This deficiency hinders a comprehensive evaluation of the economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The 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. This application echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. It is presented now under a supposedly stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are substantial deficiencies in the evidential basis for this proposal. Critical gaps in baseline data exist, along with the use of an undefined design envelope. The reliance on unspecified mitigation measures is troubling, and significant impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism effects, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects and residual impacts.

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

In addition, the proposal contradicts the National Planning Framework 4, failing to demonstrate the protection of biodiversity, natural places, and cultural heritage. It does not adequately show that health and wellbeing impacts are acceptable nor does it provide evidence of a net economic benefit, lacking tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been properly assessed, which obscures effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in certain areas. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the application of the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

When considering these points, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, preclude a lawful and evidence-based decision. The competent authority must refuse consent based on these grounds or invoke the relevant regulatory provisions to require the submission of the missing information.

Therefore, a formal request is made for the 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: FB7CF1FE

Member of the public 907

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is grounded in a thorough review of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The project is situated off the west side of the Isle of Lewis, a region notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of the proposal, particularly its proximity to the shoreline, raise serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential foundation for lawful determination. It presents critical gaps in environmental data, limited and inconsistent baseline information, and key elements of the proposal that remain undefined. The use of a flexible design framework hinders a clear assessment of potential significant effects. Furthermore, the reliance on unspecified mitigation measures renders it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, and community impacts, and the claims of negligible or non-significant effects are unsupported by reliable evidence.

There are clear and substantive conflicts with existing policy. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts are central to the statutory tests required for consent and compromise the ability of the competent authority to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal, with large turbines positioned in close proximity to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policy underscore that the application is incomplete and incapable of sustaining a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary depth and transparency, failing to provide a comprehensive view of the environmental effects related to the proposed development. A flexible Project Design Envelope is employed, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces a considerable degree of uncertainty, undermining the integrity of the assessment and obscuring the true environmental impacts from both the public and the relevant authority. As a result, the actual consequences of the development may not align with what has been presented, preventing a clear understanding of its environmental ramifications.

Moreover, the application depends significantly on unspecified mitigation measures, monitoring strategies, and management plans that have yet to be clearly defined. Seeking consent based on the promise of addressing environmental harm later is procedurally inappropriate. This approach undermines the core purpose of the Environmental Impact Assessment regime, which mandates that potential significant effects and necessary mitigation should be thoroughly established prior to any determination.

The report is further compromised by substantial evidential deficiencies, including a lack of baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. These gaps lead to uncertainty about the magnitude and significance of impacts, particularly when claims of negligible or non-significant effects are made without adequate supporting data. The insufficiency of information impedes a thorough understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that is incompatible with statutory obligations.

Consequently, the application does not satisfy the evidential threshold necessary under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation necessitates the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to the National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it has not been shown that impacts have been thoroughly evaluated or that adequate safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed, failing to deliver a complete and dependable understanding of ecological receptors within the West Lewis coastal environment. This marine system is highly sensitive and biologically active, yet the baseline data provided is incomplete, and the methodologies employed inadequately capture the presence, behaviour, and habitat use of species.

Consequently, the assessment does not establish a solid evidential basis for evaluating impacts.

A significant oversight involves otters, a European Protected Species, where the application does not adequately recognise or assess their active utilisation of coastal areas for foraging and movement. The lack of evaluation regarding their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity have not been sufficiently examined. This undermines any conclusions drawn about the absence of significant effects on this species.

Additional shortcomings are evident in the assessment of basking sharks, where the reliance on aerial surveys introduces substantial detection bias, particularly in Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to integrate or appropriately consider such data leads to an incomplete baseline and diminishes the credibility of the conclusions presented.

These methodological limitations result in conclusions of negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of adequate baseline data also hinders meaningful evaluation of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This generates uncertainty concerning the actual 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, as protected species have not been correctly identified or assessed. The uncertainty introduced prohibits the exclusion of adverse effects beyond reasonable scientific doubt, thus engaging 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 preclude a thorough evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application under consideration raises serious concerns regarding its reliability and adherence to regulatory requirements. It is situated in key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which are essential for internationally important seabird populations. However, the ornithological assessment is flawed, containing significant gaps in evidence and internal inconsistencies that compromise its conclusions. Despite the presence of these critical habitats, the application does not sufficiently demonstrate that the seabird species will not be adversely affected.

A troubling contradiction within the application is evident, as the developer claims no

significant adverse effects while also advancing a Habitats Regulations derogation case, which is warranted only when significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment and suggests that the conclusions lack support from the available evidence. Additionally, the assessment fails to adequately consider the implications of displacement, collision risk, or habitat loss, especially for vulnerable species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate potential mortality, particularly given the incomplete baseline data and the insufficient understanding of species behaviour.

The location of the turbines within a recognised migratory corridor introduces further risk, effectively acting as a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor are not thoroughly assessed, raising concerns for species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold required to confirm no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data deficiencies, and modelling limitations means the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, inhibiting a lawful conclusion in favour of consent.

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

Overall, the assessment is deemed unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These shortcomings obstruct a thorough evaluation of impacts and collectively indicate that the application does not fulfil the statutory requirements necessary for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to recognise the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are interconnected. It adopts a simplistic view of heritage, treating it as a collection of isolated, static features rather than acknowledging their ongoing social, cultural, and spiritual significance within the community. This reductive approach undermines the true nature of these assets.

Culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated inadequately. These sites remain active places of burial and spiritual practice, yet the assessment categorises them merely as static features. This oversight neglects their continued use and meaning, failing to consider how development impacts their setting. Such mischaracterisation leads to an incomplete evaluation of cultural effects

and disregards their importance in community life.

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a profound sense of remoteness. The assessment of seascape, landscape, and visual impacts associated with the proposal is deficient and fails to adequately reflect the scale of change and the sensitivity of the environment. The introduction of large-scale turbines close to the shoreline would establish a continuous and dominant industrial presence, fundamentally transforming the character of the landscape in a permanent and irreversible manner.

The application does not sufficiently represent the extent of the visual change that would occur. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations, significantly impacting visual amenity and diminishing the qualities that define naturalness and

remoteness. The current assessment does not accurately convey the level of impact or its significance in the context of such a sensitive landscape.

Methodological concerns arise regarding the selection and presentation of visual viewpoints. Evidence indicates that some viewpoints may fail to represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been underestimated, thus challenging the reliability of the assessment.

Moreover, the assessment neglects to consider the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting linked to the Atlantic horizon through visual and spatial relationships. The treatment of these sites as isolated assets does not acknowledge their interdependence, resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy perspective, the proposal is in direct conflict with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change proposed is incompatible with the necessity to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertion of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence remains dominant and unavoidable. Consequently, the change would be fundamental and permanent, and not amenable to reduction to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately represent the magnitude of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings preclude a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks sufficient detail to evaluate the likely environmental effects, as it does not provide a complete assessment of construction and pollution risks. There is a significant reliance on future mitigation and contingency measures that will be developed post-consent. This approach is particularly troubling due to the sensitivity of the receiving environment, which includes the West Lewis coastline that supports

clean coastal waters and important habitats vulnerable to sediment disturbance and contamination.

The risks acknowledged in the application, such as sediment mobilisation and accidental chemical or oil spills, are not accompanied by adequate preventative or control measures. The scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation remain uncertain, and without robust modelling and defined management strategies, the ecological effects of these impacts cannot be determined. This uncertainty also extends to potential effects on marine species and habitats that have already been identified as sensitive within the wider assessment.

Compounding these issues is the absence of detailed emergency response procedures. The deferral of contingency planning to a post-consent stage hinders any evaluation of whether appropriate safeguards are in place to manage pollution events. Such a process introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the requirements set by the Environmental Impact Assessment regime. Significant effects and their corresponding mitigation must be assessed prior to consent; without this information, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of clearly defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts create a materially deficient assessment. These shortcomings impede a thorough evaluation of construction and pollution risks and strengthen the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding marine life and fisheries. It fails to provide a strong evaluation of the ecological and socio-economic effects. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application does not demonstrate how these important uses and habitats will be protected or maintained without severe disruption.

One of the main issues is the assumption that fishing activities can be relocated without any consequences. The application does not present evidence that alternative fishing grounds exist or that they can support the additional pressure from displaced activity. This lack of information is critical, as displacement may lead to overfishing in other areas and could have broader economic ramifications for the local fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and local livelihoods are not fully understood.

Moreover, there are substantial risks posed to marine species, particularly due to the

underwater noise generated by construction activities. High-energy hammer piling over extended periods is expected to disturb marine life across large distances, affecting species like dolphins. The predicted disruption to a considerable portion of the local bottlenose dolphin population is concerning. However, the application downplays the significance of these effects and lacks adequate supporting evidence.

There is also an evident contradiction within the application regarding the need for licences to permit harm to European Protected Species while simultaneously claiming that the impacts are negligible. This inconsistency undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where anticipated harm may require legal authorisation.

The application does not adequately consider the cumulative impacts of multiple pressures, including habitat disturbance, noise, and the displacement of fishing activities. A thorough evaluation of these combined effects is necessary to assess the overall impact on marine ecosystems and socio-economic conditions accurately.

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 the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, thus preventing any conclusion that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application for the project is fundamentally flawed, as it does not adequately assess the onshore infrastructure, leaving significant gaps in understanding its environmental and socio-economic impacts. The offshore turbines and onshore works are deeply interconnected, yet they are being evaluated independently. This disjointed approach obscures the full scale of the project’s effects, resulting in an incomplete analysis that fails to capture the cumulative impact of these linked components.

Key onshore elements consist of cabling traversing protected moorland, the construction of a substation in proximity to Stornoway, and the creation of access routes through sensitive landscapes. Notably, the construction involves excavating areas of deep peat, particularly within Barvas Moor, which serves as an important carbon store and is an ecologically sensitive habitat. The current application lacks a thorough evaluation of these impacts, which is crucial for comprehensively understanding the project's overall environmental footprint.

By neglecting to assess onshore impacts or delaying this assessment, the application hinders a proper evaluation of cumulative effects. The Environmental Impact

Assessment mandates that all aspects of a project must be assessed collectively. The current separation of offshore and onshore elements leads to an incomplete understanding of how combined impacts affect peatlands, habitats, and local communities.

The proposal raises serious concerns regarding the integrity of sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The lack of evidence that these impacts have been fully assessed or that suitable avoidance measures have been applied signifies a notable evidential gap in the realm of biodiversity protection.

Furthermore, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application fails to demonstrate that necessary consents or processes have been initiated, which brings into question the project's deliverability and lawful implementation.

From a policy standpoint, the disjointed assessment of the project components and the failure to ensure protection for peatlands, habitats, and land use interests is in direct conflict with the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated significantly undermines the legitimacy of the application.

Overall, the fragmented evaluation of the project components, the absence of a comprehensive assessment, and the lack of supporting evidence on environmental and land use impacts render this section of the application incomplete and untrustworthy, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks a crucial assessment of dark skies and nocturnal wildlife, representing a significant oversight. The coastline of West Lewis is known for its exceptionally dark skies, which are essential to the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting, which would be visible over extensive distances and create a continuous “wall of light” effect across the western horizon, thus fundamentally changing the night-time environment.

Furthermore, the application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This omission is particularly notable given the significance of dark skies to the local identity and the growth of tourism sectors such as astro-tourism. The lack of consideration for these impacts leads to a clear deficiency in the overall landscape and environmental assessment.

Additionally, there is no investigation into the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly vulnerable to artificial lighting due to phototaxis, which can cause

disorientation and increase the risk of collision. The application fails to include any lighting impact assessment or phototaxis study, thus neglecting to evaluate how aviation lighting may affect these species or exacerbate mortality rates.

This gap is exacerbated by the dependence on daytime survey data within the ornithological assessment, which does not account for nocturnal activity or the associated risks. Species such as Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The absence of site-specific night-time data leaves a critical void in understanding the ecological impacts.

Without an assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites would experience adverse effects. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is unmet, thus invoking the precautionary principle and inhibiting a lawful determination.

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

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the standards for sustainable development. It does not satisfy statutory duties, national policy, or evidential standards. Similar issues were present in the rejected 2008 Lewis Wind Power proposal, where the level of industrialisation was deemed unacceptable. The current application is under a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still falls short.

There are significant gaps in the information provided. The application relies on an undefined design envelope and on unspecified mitigation measures, which are critical oversights. Essential impact pathways have been omitted, such as those concerning nocturnal wildlife, complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete and does not allow for a thorough understanding of potential significant effects or residual impacts.

Procedural deficiencies are evident, particularly the lack of a compliant Island Communities Impact Assessment, which breaches statutory obligations under the Islands (Scotland) Act 2018. The failure to present a full Social Impact Assessment

represents a significant omission. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal contradicts the National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural areas, and cultural heritage. Furthermore, it fails to show that health and wellbeing impacts are acceptable and cannot provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been assessed properly, leaving significant impacts on peatlands, carbon balance, habitats, and crofting land obscured.

Environmental risks related to marine ecology, seabirds, protected species, and marine mammals remain uncertain and potentially significant. The assessments are incomplete and sometimes inconsistent. The evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

Additionally, the proposal would cause significant and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and disruptions to cultural and visual relationships, along with negative effects on tourism, represent permanent impacts that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The numerous information deficiencies, combined with policy conflicts and unresolved environmental risks, obstruct a lawful, evidence-based decision. Therefore, the competent authority should refuse consent or require the submission of the missing information. A formal request is made for the complete refusal of the Spiorad na Mara Offshore Wind Farm application.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 9E0B3921

Member of the public 908

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A review of the Environmental Impact Assessment Report and its supporting documentation has revealed numerous material deficiencies across planning, environmental, cultural, and procedural domains. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, nearly untouched environment, and robust cultural identity. The scale, proximity, and design of the wind farm raise significant concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis necessary for a lawful determination. Important environmental data is absent, baseline information is both limited and inconsistent, and critical elements of the proposal remain unspecified. The employment of a flexible design framework hinders a clear understanding of likely significant effects. Additionally, the reliance on yet-to-be-defined mitigation measures means that their effectiveness cannot be evaluated. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust supporting evidence.

There are notable and significant policy inconsistencies. The proposal appears to conflict 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 obligations to protect biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests required for consent and compromise the ability of the competent authority to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal in this location, with large turbines located in close proximity to the shoreline, raises serious concerns regarding landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation, evidential shortcomings, and clear policy non-compliance illustrates that the application is incomplete and cannot support a lawful determination. In light of these findings, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, transparent, or 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 proposes a development that inadequately assesses alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on environmental effects, it provides a narrative account of the project's evolution. This narrative does not demonstrate that less harmful options have been identified, assessed, and selected over more damaging solutions.

There is a lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has considered placing turbines further offshore, where visual, ecological, and coastal impacts could potentially be reduced. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in assessing impact, the absence of such analysis undermines any claim that the proposed siting represents the least damaging option.

The deficiencies are also evident in the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual importance such as Barvas Cemetery. The failure to present a clear avoidance strategy and the lack of comparative analysis suggest that mitigation by design has not been implemented, with reliance instead on post-design mitigation measures.

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

From a policy standpoint, this inadequacy compromises compliance with National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not undergone adequate assessment and therefore cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment 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 ornithological assessment associated with the application exhibits significant deficiencies, marked by notable gaps in evidence and contradictions that diminish its credibility. It is essential to recognise that the west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already experiencing decline. However, the application fails to adequately demonstrate, to the necessary evidential standard, that these species will not face adverse impacts. The development's location within critical foraging areas and migratory pathways further exacerbates the issue, as the assessment does not thoroughly analyse potential displacement, collision risks, or habitat loss.

A critical inconsistency within the application arises from the developer's assertion that there will be no significant adverse effects, coupled with the pursuit of a Habitats

Regulations derogation case. Such a case is only necessitated when significant harm is anticipated. This contradiction raises serious questions regarding the assessment's reliability, suggesting that the conclusions drawn are unsupported by the foundational evidence.

Furthermore, the assessment lacks sufficient evidence to ensure that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not comprehensively acknowledged, and the reliance on modelling techniques brings uncertainty, particularly concerning species in steep decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underreport mortality rates, particularly in the absence of complete baseline data and a full understanding of behavioural responses.

Additionally, the placement of turbines within a recognised migratory corridor poses substantial risks, essentially creating an obstruction in a primary flight path used by species migrating between the United Kingdom and Iceland. The application inadequately assesses the long-term consequences of ongoing mortality within this corridor or the potential ramifications for species with relatively small global populations.

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

Moreover, the identified deficiencies signify a failure to comply with National Planning Framework 4 concerning biodiversity protection and the conservation of natural assets. The inability to demonstrate that internationally significant seabird populations will remain unharmed places the proposal in direct opposition to national policy.

In summary, the assessment's reliability is undermined by internal inconsistencies, methodological flaws, and insufficient evidence. These shortcomings inhibit a comprehensive evaluation of the impacts and collectively indicate that the application does not fulfil the statutory requirements necessary for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to adequately address the intertwined nature of community identity and cultural heritage along the West Lewis coastline, viewing it merely as a collection of static assets instead of a vibrant cultural landscape where environment, language, and tradition are deeply interconnected. It neglects the ongoing social, cultural, and spiritual functions of heritage within the community.

Significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are treated as mere static features despite their active roles as places of burial and spiritual

significance. This oversight leads to a misrepresentation of their meaning and continued use, resulting in an incomplete understanding of the cultural effects of the proposed development and ignoring their importance to community life.

Furthermore, the application disregards intangible cultural heritage, including the Gaelic language and local traditions, as well as the longstanding relationship the community maintains with the coastal environment. These vital components of the area's identity are missing from the assessment, representing a major shortfall that hampers a complete understanding of the development's cultural implications.

Concerns also extend to community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity that aligns with the characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent, which undermines the integrity of the assessment and neglects established principles for involving communities in decisions impacting their cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment is a significant procedural failure and a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligations to assess the social, cultural, and economic effects on the island community, rendering any determination legally questionable.

From a policy standpoint, these shortcomings conflict with National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. By failing to consider both tangible and intangible heritage and to acknowledge living cultural practices, the application deviates from essential policy standards.

In summary, the cumulative lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory responsibilities results in a substantial evidential gap. The cultural impacts associated with the development have not been adequately evaluated, leaving the application without a sufficient basis for determining the genuine cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The current proposal exhibits significant deficiencies in its assessment of social impacts, health, and wellbeing, lacking the necessary transparency for a lawful evaluation. Although the developer has conducted a Social Impact Assessment, which included focus groups with local residents, the complete report remains unpublished. This creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to assess the full extent of social risks identified through the developer’s research.

Preliminary summaries indicate that local residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These reported impacts stem from direct engagement and are factual,

not speculative. However, the lack of disclosure regarding the full assessment limits scrutiny of these findings and obstructs a thorough evaluation of their significance in the decision-making process.

Furthermore, the proposal is perceived as a threat to community identity and cohesion, with “cultural loss” highlighted within the developer's findings. Yet, these impacts have not been adequately incorporated into the main application or given the necessary consideration. The withholding of the complete Social Impact Assessment obscures the true human and social costs of the development.

This lack of transparency also undermines the Environmental Impact Assessment process. To ensure a comprehensive understanding of the social, economic, and health impacts of such developments, especially when community character may be affected, the full dataset is essential. Without it, the application fails to provide a complete evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments must promote positive health outcomes and avoid causing harm; however, the existing evidence suggests adverse effects that have not been fully revealed. Consequently, without the complete assessment, the ability to demonstrate compliance with this policy is compromised.

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 crucial omission within the application and a failure to satisfy the evidential requirements set forth by the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, coupled with evidence of existing negative impacts, results in an incomplete and unreliable assessment. This limitation prevents a lawful determination and reinforces the assertion that the application is lacking sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual and landscape impacts of the proposed development is inadequate and does not reflect the significant changes or the sensitivity of the West Lewis coastline. This area is known for its open Atlantic horizon and undeveloped character, which provide a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a dominant industrial presence, fundamentally altering the area’s character and resulting in a permanent transformation of the landscape.

The application does not effectively depict the extent of visual change. The size and closeness of the turbines would dominate views from residential locations, historic sites, and popular coastal areas. This would adversely affect visual amenity and

diminish the naturalness and remoteness that define the region. The assessment fails to adequately communicate the level of impact or its importance within this sensitive landscape.

Methodological issues also arise concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact has been underestimated, which undermines the assessment's reliability.

Moreover, there is a failure to consider the interconnected relationships between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as separate entities rather than recognising their interdependence, resulting in an incomplete evaluation of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and affecting their relationship with the natural horizon. This represents not only a visual impact but also a 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 regarding the protection of natural areas and historic assets. The magnitude of change is at odds with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further calls into question the proposal’s compliance with policy requirements.

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

In summary, the assessment inadequately represents the scale of impact, the sensitivity of the environment, and the interlinked nature of landscape and heritage. These shortcomings hinder a reliable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal does not adequately address construction and pollution risks, leading to an incomplete assessment of potential environmental effects. There is significant seabed preparation and installation planned in a high-energy Atlantic environment. However, the absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans raises serious concerns. Instead, the application relies on mitigation and contingency measures that would be created after consent,

which makes it impossible to assess their sufficiency or effectiveness.

This issue is particularly alarming because the West Lewis coastline features clean coastal waters and important habitats that could be harmed by sediment disturbance and contamination. Although the application notes risks such as sediment mobilisation and the possibility of chemical or oil spills, it lacks sufficient detail on how these incidents will be prevented, controlled, or monitored.

There is also ambiguity surrounding the behaviour and scale of sediment plumes that might result from seabed disturbance and cable installation. Without strong modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty encompasses potential consequences for marine species and habitats that have already been recognised as sensitive within the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application hinders the evaluation of whether adequate safeguards are in place for addressing pollution events. This introduces procedural risks and hampers the competent authority's ability to assess the environmental protection measures necessary at the determination stage.

From a regulatory standpoint, postponing vital environmental safeguards goes against the requirements set by the Environmental Impact Assessment regime. Significant effects and their mitigation must be reviewed before consent is granted, and without this information, a lawful determination cannot occur. The application also does not prove adherence to policy requirements concerning environmental protection and water quality.

In conclusion, the lack of defined mitigation measures, insufficient management plans, and uncertainty about potential impacts make the assessment materially inadequate. These deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the notion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

One major concern is the assumption that fishing activities can be relocated without negative effects. The application fails to provide evidence that alternative fishing grounds exist, are accessible, or can sustain the added pressure. This gap in the assessment is crucial, as displacing fishing efforts could lead to overfishing in other areas, potentially resulting in broader economic repercussions for the local fishing

fleet. The lack of a clear, evidence-based assessment hampers the understanding of impacts on fisheries and local livelihoods.

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

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

Furthermore, the assessment neglects to account for cumulative impacts that arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive review of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure related to the project is fundamentally lacking and does not adequately address the full range of impacts arising from this integrated initiative. The connection between the offshore turbines and the onshore works is essential; however, their separate evaluations lead to a fragmented understanding of the environmental and socio-economic consequences.

Onshore elements involve cabling that traverses protected moorland, the construction of a substation near Stornoway, and associated access routes through sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, which is both a significant carbon store and an ecologically sensitive area. The failure to provide a comprehensive assessment of these impacts limits understanding of the overall environmental footprint of the project.

By omitting or postponing the assessment of onshore impacts, the application undermines the ability to properly evaluate cumulative effects. The Environmental Impact Assessment process stipulates that all project components must be considered in conjunction; however, the division between offshore and onshore elements obscures the combined impacts on peatlands, habitats, and local communities.

Moreover, sensitive habitats, including machair systems and peatland environments, face considerable risks, and these areas are subject to policy protections. The application lacks evidence that the impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been implemented, highlighting a significant gap in the protection of biodiversity.

Concerns also arise regarding the carbon balance, as disturbances to peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this matter or prove that the overall carbon balance is positive.

Additionally, routing infrastructure through active croft land raises possible conflicts with existing land use and legal rights. There is a lack of evidence that the requisite consents or processes have been initiated, which calls into question the feasibility and lawful execution of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment regarding dark skies and nocturnal wildlife is a significant flaw within the Environmental Impact Assessment. The coastline of West Lewis is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting will be visible over considerable distances, creating an intrusive “wall of light” effect on the western horizon that will fundamentally change the night-time landscape.

Furthermore, the proposal fails to evaluate the implications of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning as dark skies are essential to the identity of the region and to

the growth of emerging sectors like astro-tourism. By neglecting these impacts, the assessment reveals a significant gap in the overall landscape and environmental evaluation.

Equally alarming is the lack of any investigation into the impacts on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly susceptible to artificial lighting, which can disorient them and increase their risk of collision. The absence of a lighting impact assessment or a phototaxis study means there has been no consideration of how aviation lighting might affect these birds or contribute to their mortality rates.

This issue is worsened by the overreliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity or the associated risks. Even species like Kittiwakes, known to forage or migrate at night, are at risk of disorientation from artificial light, but this danger has not been evaluated. The lack of site-specific data regarding night-time activity leads to a critical misunderstanding of ecological impacts.

Without a thorough examination of nocturnal consequences, it is impossible to ascertain whether protected species or designated sites would suffer adverse effects. The required evidential standard to dismiss adverse effects beyond reasonable scientific doubt is not achieved, necessitating the precautionary principle and preventing a lawful determination.

From a policy standpoint, this absence conflicts with the National Planning Framework 4 concerning the safeguarding of natural environments and environmental quality. It also diminishes the comprehensive evaluation of landscape and seascape impacts, given that the night-time character is a fundamental aspect of the environment.

In summary, the lack of any assessment regarding dark skies and nocturnal wildlife represents a considerable evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and incapable of supporting a lawful decision.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm presents significant shortcomings that undermine sustainable development, failing to meet the necessary statutory duties and national policy requirements. The project mirrors the core issues of the 2008 Lewis Wind Power proposal, which was previously denied due to unacceptable levels of industrialisation. Despite being submitted under an updated policy framework that emphasises biodiversity, peatland conservation, landscape preservation, and community wellbeing, the proposal still falls short.

Critical gaps in the evidence base are evident, particularly concerning baseline data and the reliance on an undefined design envelope. The proposal includes unspecified mitigation measures and omits key impacts such as those on nocturnal wildlife, the full

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

Moreover, procedural deficiencies abound. The lack of a compliant Island Communities Impact Assessment is a breach of the Islands (Scotland) Act 2018, and the non-disclosure of a full Social Impact Assessment constitutes a serious omission. These gaps 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 conflicts with National Planning Framework 4, lacking evidence of biodiversity protection, safeguarding natural areas and cultural heritage, and failing to demonstrate acceptable health and wellbeing impacts. It does not provide any proof of net economic benefit due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are not only uncertain but potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The application does not meet the evidential threshold required to exclude adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

The proposal is set to cause extensive and irreversible changes to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and the disruption of cultural and visual relationships, along with the negative repercussions on tourism, represent permanent effects that cannot be sufficiently mitigated.

In summary, the application is procedurally and substantively unfit for determination. The numerous information deficiencies, combined with policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. It is imperative that the competent authority refuse consent based on these grounds or mandate the submission of the necessary 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: F5E502DF

Member of the public 909

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. The objection arises from a careful examination of the Environmental Impact Assessment Report and accompanying documents, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural integrity. The proposed development is situated off the west coast of the Isle of Lewis, an area noted for its stunning Atlantic coastline, largely untouched environment, and rich cultural heritage. The design, scale, and proximity of the project to the shore raise serious questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

There is a conspicuous lack of adequate evidence to support a lawful decision regarding the application. Essential environmental data is absent, with baseline information being both limited and inconsistent, and many critical components of the proposal remain undefined. The implementation of a flexible design framework complicates the understanding of potential significant impacts, while the reliance on unspecified mitigation measures hinders any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community implications, and assertions regarding negligible effects lack robust evidence.

Moreover, there are evident policy inconsistencies. The application appears to contradict the National Marine Plan, the Environmental Impact Assessment process, and National Planning Framework 4, particularly concerning biodiversity, cultural heritage, natural environments, and public health and wellbeing. It does not sufficiently illustrate that the national obligations for safeguarding biodiversity, addressing climate issues, and preserving environmental integrity will be met. These discrepancies are critical to the statutory tests required for consent and compromise the competent authority's capacity to determine the proposal's acceptability in policy terms.

The unprecedented scale of the project, with large turbines placed in close proximity to the coast, raises alarming concerns regarding landscape capacity, visual impact, and overall environmental repercussions. Taken as a whole, the lack of comprehensive information, reliance on undefined mitigation strategies, evidential shortcomings, and clear non-compliance with policy reflect that the application is incomplete and cannot support a lawful decision. In light of these issues, it is imperative that the precautionary principle is invoked.

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 assessment of alternatives is fundamentally flawed and does not satisfy the statutory requirements of the Environmental Impact Assessment regime. Rather than offering a structured and reasoned comparison of realistic alternatives with respect to

environmental effects, the application merely recounts the evolution of the project. This narrative fails to prove that less harmful options have been thoroughly identified, assessed, and preferred over 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 show that the developer has genuinely considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. Given the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impact, the absence of such analysis prevents any conclusion that the proposed siting is the least damaging option.

These shortcomings also extend to the assessment of cable routing and landfall, as there is inadequate evidence that alternative routes have been sufficiently explored to avoid or mitigate impacts on sensitive receptors. This includes significant areas of cultural and spiritual importance, 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 implemented, with an overreliance instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been reduced through thoughtful site selection, layout, and infrastructure routing. This represents a significant deviation from the established mitigation hierarchy and hampers the competent authority's ability to ascertain whether less harmful and more appropriate alternatives are available. In the absence of a comprehensive alternatives assessment, it cannot be concluded that the proposal is sustainable or compliant with policy.

From a policy perspective, this deficiency compromises adherence to National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a material oversight that supports the overall conclusion that the application lacks adequate evaluation and cannot justifiably receive a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed application presents a significant deficiency in the assessment of marine ecology and protected species, failing to provide a complete and reliable understanding of the ecological receptors present within the West Lewis coastal environment. This region is a highly sensitive and biologically active marine system, yet the baseline data is incomplete, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a sound evidential foundation necessary for evaluating potential impacts.

A notable gap exists in the consideration 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. The failure to account for their core foraging range and behavioural patterns leads to an insufficient assessment of the potential effects of construction disturbance, noise, and increased activity, ultimately undermining any conclusions regarding significant effects on this species.

Additionally, the evaluation of basking sharks is deficient due to an overreliance on aerial surveys, which introduces a significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The neglect to incorporate or appropriately consider such data leads to an incomplete baseline, weakening the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects being based more on assumptions than on robust evidence. The lack of adequate baseline data further obstructs a meaningful assessment of cumulative and indirect impacts, such as seasonal variation and broader ecosystem interactions. This uncertainty raises concerns about the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out in the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The level of uncertainty introduced means that adverse effects cannot be reasonably excluded, thus invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies inhibit a comprehensive evaluation of impacts on marine ecology and protected species, further affirming that the application does not possess a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally flawed and presents significant gaps in evidence, along with inconsistencies that cast doubt on its conclusions. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already in decline. However, the application fails to provide adequate evidence that these species will not be adversely impacted. Key foraging areas and migratory pathways are affected by the development, yet the assessment does not thoroughly evaluate the risks associated with displacement, collision, or habitat loss.

There is a contradiction in the application, as the developer claims there will be no significant adverse effects while also pursuing a Habitats Regulations derogation, which is only necessary when significant harm is anticipated. This inconsistency raises

concerns about the reliability of the assessment and suggests that the conclusions drawn are not backed by the available evidence. Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The critical nature of these feeding grounds is not fully considered, and the reliance on modelling introduces uncertainty, particularly for species experiencing severe declines, such as Kittiwakes and Fulmars. The methods used likely underestimate mortality rates due to incomplete baseline data and an inadequate understanding of behavioural responses.

The location of turbines within a recognised migratory corridor poses an additional and significant risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not properly assess the long-term consequences of ongoing 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 standards needed to assert no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data deficiencies and modelling issues, fails to fulfil the requirement of being beyond reasonable scientific doubt. This invokes the precautionary principle and obstructs a lawful conclusion that could support consent. Additionally, these shortcomings indicate a lack of compliance with the National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to prove that internationally significant seabird populations will not be adversely affected directly contradicts national policy.

Overall, the assessment is unreliable, marked by internal inconsistencies, methodological flaws, and insufficient evidence. These deficiencies hinder a thorough evaluation of the impacts and lead to the conclusion that the application does not satisfy the legal requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity, particularly concerning the West Lewis coastline, which is a living cultural landscape where environment, language, tradition, and community are interconnected. The application treats heritage as isolated and static rather than recognising its ongoing social, cultural, and spiritual significance within the community.

There is a significant deficiency in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites serve as active burial and spiritual places, yet they are mischaracterised as static features. This approach neglects their continued use and meaning, which impacts the understanding of development effects on their setting.

Additionally, the assessment overlooks intangible cultural heritage, including the Gaelic language, traditions, and the community's longstanding relationship with the coastal environment. These elements are essential to the area's identity, yet they are

completely absent from the evaluation, which is a major omission. Without accounting for these factors, the cultural impacts of the proposed development cannot be fully understood.

There are also important concerns regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity recognised as part of Indigenous Peoples, but the absence of a Free, Prior and Informed Consent process undermines the validity of the assessment. This lack of meaningful engagement does not align with established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural flaw is the lack of an Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This assessment is necessary for the competent authority to evaluate the social, cultural, and economic effects on the island community. Its absence alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings conflict with National Planning Framework 4, especially regarding the protection of historic assets and places. The failure to address both tangible and intangible heritage, as well as to acknowledge living cultural practices, signifies a clear deviation from policy requirements.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing associated with the proposal is critically inadequate and lacks the necessary transparency for a lawful assessment. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents; however, the complete report has not been made available. This gap in evidence significantly hinders both public understanding and the competent authority's ability to grasp the full scope of social risks identified by the developer's own research.

Summaries that are currently available reveal that residents are already suffering from notable stress, anxiety, and concerns linked to the scale and proximity of the development. These impacts arise from direct interactions with the community, thus are not merely speculative. Nevertheless, the decision not to release the full assessment obstructs meaningful examination of these findings and restricts the capacity to evaluate their relevance in the decision-making process.

Moreover, there is clear indication that the proposal is regarded as a direct threat to community identity and cohesion, with “cultural loss” flagged in the developer's own findings. Despite this recognition, such impacts have not been adequately incorporated

into the principal application or given the necessary emphasis. The decision to withhold the complete Social Impact Assessment obscures the genuine human and social costs of the development.

This lack of transparency also compromises the Environmental Impact Assessment process. A thorough understanding of social, economic, and health implications is crucial for developments of this magnitude, particularly when community character and functionality are at stake. The failure to provide the complete dataset means the application does not present a comprehensive evidential basis for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 concerning health and wellbeing. Developments must promote positive health outcomes and mitigate harm, yet the evidence at hand points to existing adverse effects that remain undisclosed. Without the full assessment, compliance with this policy cannot be substantiated.

The procedural consequences are considerable. The competent authority is unable to carry out a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This oversight constitutes a material deficiency within the application and signifies a failure to fulfil the evidential criteria set out by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the comprehensive Social Impact Assessment, coupled with evidence of ongoing negative impacts, leads to an incomplete and unreliable assessment. This undermines the legitimacy of the determination process and reinforces the assertion that the application lacks sufficient information to be supported.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal for large-scale turbines near the West Lewis coastline presents significant shortcomings in the assessment of seascape, landscape, and visual impacts. This coastline, characterised by its open Atlantic horizon, undeveloped nature, and a pronounced sense of remoteness, would face fundamental alterations due to the introduction of an industrial presence in close proximity to the shoreline. Such a transformation is not only significant but also permanent and irreversible, fundamentally changing the landscape character.

The application inadequately portrays the extent of visual change, as the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively affect visual amenity and compromise the essential qualities of naturalness and remoteness that define the area. The current assessment fails to capture the severity of this impact or its importance within the context of such a sensitive landscape.

Methodological issues are also evident in the selection and presentation of visual

viewpoints. It appears that these viewpoints may not adequately reflect the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and areas of high landscape value. This raises concerns that the assessment may have understated the magnitude of visual impacts, thereby questioning the reliability of the findings.

Moreover, the assessment does not consider the interconnected nature of landscape, seascape, and cultural heritage. Notably, sites such as the Calanais Standing Stones and other Scheduled Monuments are embedded within a broader landscape context that relies on visual and spatial links to the Atlantic horizon. By treating these assets as separate entities, the assessment overlooks their interdependence, leading to an incomplete analysis of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and severing their relationship with the natural horizon. This results not only in a visual impact but also in broader cultural and spatial harm, which the application has not sufficiently evaluated.

From a policy standpoint, the proposal conflicts with National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The scale of the proposed changes is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further diminishes any claims of compliance with policy requirements.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelmingly dominant and unavoidable. As such, the anticipated changes represent a fundamental and permanent alteration that cannot be lessened to an acceptable level through mitigation measures.

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

CONSTRUCTION AND POLLUTION RISKS

The application lacks crucial detail necessary for a comprehensive understanding of the environmental risks associated with construction and pollution. Significant seabed preparation and installation activities are proposed within a challenging high-energy Atlantic environment; however, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans presented. Instead, the application relies on unspecified mitigation and contingency measures that would be prepared only after consent is granted, which severely limits the ability to assess their adequacy or effectiveness at this stage.

Particularly alarming is the proposal's failure to adequately consider the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and essential habitats that are susceptible to sediment disruption and contamination. While the application acknowledges the potential risks of sediment mobilisation and accidental chemical or oil spills, it does not sufficiently detail the preventative, control, or monitoring measures that would be put in place to address these risks.

There is significant uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without thorough modelling and well-defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these disturbances. This uncertainty extends to potential impacts on marine species and habitats, which have already been identified as sensitive within the broader assessment context.

Moreover, the absence of detailed emergency response procedures adds to the growing concerns surrounding this application. By postponing contingency planning until after consent, the proposal hinders an evaluation of whether adequate safeguards are established for responding to pollution incidents. This creates procedural risks and diminishes the capacity of the competent authority to assess the environmental protection measures before making a determination.

From a regulatory standpoint, the postponement of essential environmental safeguards is at odds with the requirements set forth by the Environmental Impact Assessment regime. It is critical that likely significant effects and mitigation strategies are assessed prior to consent; without this information, a lawful determination cannot be achieved. The application also falls short of demonstrating compliance with policy requirements related to environmental protection and water quality.

In summary, the application's deficiencies—including the lack of defined mitigation measures, the absence of detailed management plans, and uncertainties surrounding potential impacts—render the assessment materially inadequate. These issues prevent a solid evaluation of construction and pollution risks and support the conclusion that the application is fundamentally incomplete.

FISHERIES AND MARINE LIFE

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

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

livelihoods remain unclear.

Moreover, the project poses considerable threats to marine species, especially due to the underwater noise produced during construction. The use of high-energy hammer piling over prolonged periods is anticipated to disturb marine life across extensive areas, particularly affecting dolphins. The expected disruption to a significant portion of the local bottlenose dolphin population raises substantial worries, yet the application minimises these effects without adequate evidence.

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The onshore infrastructure assessment is significantly inadequate and fails to take into account the comprehensive impacts resulting from a singular integrated project. The offshore turbines and onshore works are inherently connected, yet their separate assessments lead to a disjointed approach that conceals the true magnitude of environmental and socio-economic effects.

Among the onshore components are cabling across protected moorland, the construction of a substation located near Stornoway, and the necessary access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, which serves as a crucial carbon store and ecologically significant habitat. The application lacks a thorough examination of these impacts, obstructing a full understanding of the project's overall environmental footprint.

By neglecting or postponing the assessment of onshore impacts, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment procedure mandates that all project elements be considered collectively, yet the division between offshore and onshore components means that the combined impacts on peatlands, habitats, and communities are not thoroughly understood.

Moreover, there are considerable risks to sensitive habitats, such as machair systems and peatland environments, which are subject to policy protections. The application does not provide proof that impacts on these habitats have been comprehensively assessed or that suitable avoidance measures have been implemented. This results in a clear evidential gap concerning biodiversity protection.

The proposal further raises issues related to carbon balance, as the disturbance of peatland releases stored carbon, potentially resulting in a carbon debt that contradicts the goals of renewable energy development. This matter is not sufficiently addressed within the application, which does not demonstrate that the overall carbon balance is indeed beneficial.

Additionally, the routing of infrastructure through active croft land poses potential conflicts with established land use and legal rights. The application fails to present evidence that necessary consents or processes have been initiated, casting doubt on the deliverability and lawful execution of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to include any evaluation of dark skies and nocturnal wildlife, which is a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, which contribute to the area's environmental quality, cultural identity, and tourism value. The proposal introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

There has been no assessment of the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This gap is particularly concerning given the importance of dark skies for the area's identity and for emerging sectors such as astro-tourism. The lack of consideration for these impacts

indicates a clear shortfall in the overall landscape and environmental evaluation.

Moreover, the application does not include any assessment of the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial lighting, which can cause disorientation and increase the risk of collision. The absence of a lighting impact assessment or phototaxis study means that the potential effects on these species and their mortality rates remain unexamined.

This issue is exacerbated by the dependence on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and related risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been addressed. The lack of site-specific night-time data creates a serious shortcoming in understanding ecological impacts.

Without an assessment of nocturnal impacts, it is 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 cannot be satisfied, thus invoking the precautionary principle and preventing a lawful decision.

From a policy standpoint, this omission contradicts National Planning Framework 4, which pertains to the protection of natural places and environmental quality. Additionally, it undermines the overall evaluation of landscape and seascape impacts, as the character of night-time environments is a vital component of the ecological setting.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the criteria of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. It 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 latest application is now presented within a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis provided by the application is neither complete nor reliable. There are notable deficiencies in baseline data, reliance on an undefined design envelope, and unspecified mitigation measures. Additionally, the application overlooks crucial impact pathways, including those affecting nocturnal wildlife, the complete onshore

infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of potential significant effects and residual impacts.

Furthermore, there are distinct procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties as outlined in the Islands (Scotland) Act 2018. The omission of a comprehensive Social Impact Assessment further compounds these issues, obstructing the competent authority from effectively assessing the impacts on community wellbeing, cultural identity, and economic resilience. These inadequacies are enough to deem the application unsuitable for determination.

The proposal stands in direct opposition to the National Planning Framework 4, failing to demonstrate adequate protection for biodiversity, natural places, and cultural heritage. It does not provide evidence that health and wellbeing impacts are acceptable, nor does it show a net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore components has not been conducted properly, which obscures understanding of effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are not only uncertain but potentially significant as well. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent with each other. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

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

In light of these numerous and serious concerns, the application is both procedurally and substantively unfit for determination. The scale of information gaps, alongside conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or invoke the appropriate regulatory measures to compel the submission of the missing information.

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

Additional Comments

Scotland already produces more power than the grid can cope with in fact we already pay companies to power down as to not overload the grid
We cannot allow another foreign NGO to overstep on Scottish land and heritage.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 053F8942

Member of the public 910

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and the accompanying documentation reveals significant deficiencies in planning, environmental, cultural, and procedural aspects. The development is situated off the west coast of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The design, scale, and proximity of the proposed wind farm raise urgent concerns about its compliance with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential foundation necessary for a lawful determination. There are critical gaps in environmental data, and the baseline information provided is both limited and inconsistent. Many key elements of the proposal remain undefined. The employment of a flexible design framework obscures a clear comprehension of potential significant effects, and the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation fails to facilitate a comprehensive or informed understanding of the impacts on the environment, cultural heritage, or local communities. Assertions of negligible or non-significant effects are not underpinned by robust evidence.

Moreover, there are evident and serious conflicts with policy. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These policy conflicts are pivotal, undermining the capacity of the competent authority to determine that the development meets acceptable policy standards.

The unprecedented scale of the proposal poses significant challenges for this location, as it includes large turbines placed in close proximity to the shoreline. This raises major concerns about landscape capacity, visual impact, and overall 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 issues, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate, failing to deliver a comprehensive, transparent, or dependable account of the potential environmental effects of the proposed development. The employment of a flexible Project Design Envelope, lacking a commitment to defined turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This uncertainty undermines the assessment's integrity and prevents both the public and the competent authority from grasping the true extent of the environmental impacts that may arise from the development constructed.

Furthermore, the application is heavily reliant on mitigation measures, monitoring strategies, and management plans that are yet to be specified. Seeking consent on the basis that any environmental harm will be addressed subsequently hinders a meaningful evaluation of their effectiveness and obstructs the assessment of residual impacts. This postponement of vital information to post-consent phases is procedurally inappropriate and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant likely effects and mitigation must be clearly established before determination.

Evidential shortcomings are also present, highlighted by gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to meet statutory requirements.

As a result, the application does not meet the evidential threshold required under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also does not illustrate compliance with National Planning Framework 4, including provisions related to biodiversity protection and environmental integrity, as it cannot demonstrate that the impacts have been thoroughly assessed or that suitable safeguards are in place.

Collectively, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies preclude a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make a determination based on the information presented.

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

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

been sufficiently evaluated. This gap undermines the conclusions drawn regarding the absence of significant effects on otters.

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

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

From a regulatory standpoint, the application does not satisfy the stipulations of the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The level of uncertainty engendered by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these conditions, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These shortcomings impede a thorough evaluation of impacts on marine ecology and protected species, further supporting the assertion that the application does not rest on a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamental contradiction by asserting that there will be no significant adverse effects, while simultaneously making a Habitats Regulations derogation case, which is only required when significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the ornithological assessment, suggesting that the conclusions reached are not backed by adequate evidence. The assessment contains significant gaps and internal inconsistencies that undermine its validity.

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to provide sufficient evidence demonstrating that these species will not be adversely affected. Key foraging areas and migratory pathways are present in the development site, yet the assessment does not effectively evaluate the potential consequences of displacement, collision risk, or habitat loss for these birds.

The methodologies used in the assessment are likely to underestimate mortality rates, particularly for species in severe decline, such as Kittiwakes and Fulmars. There is a significant reliance on modelling approaches, which introduces uncertainty regarding the true impact on seabirds associated with protected sites, including the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not fully accounted for, raising further concerns about the adequacy of the analysis.

Additionally, the positioning of turbines within a recognised migratory corridor poses an increased risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of potential sustained mortality within this corridor or the effects on species with relatively small global populations.

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

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

In summary, the assessment is fundamentally unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These flaws prevent a comprehensive evaluation of impacts and contribute to the overarching conclusion that the application does not satisfy the statutory requirements necessary for its determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally inadequate, particularly in its treatment of the West Lewis coastline, which should be regarded as a living cultural landscape where environment, language, tradition, and community are interconnected. The application adopts a reductive approach, treating heritage merely as isolated, static assets instead of recognising their ongoing social, cultural, and spiritual roles within the community.

Notably, the assessment fails to properly address culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These active burial and spiritual practice locations are mischaracterised as static features, overlooking their continued use and meaning, as well as the potential impacts of development on their settings. This misrepresentation leads to an incomplete evaluation of cultural effects and neglects their importance in community life.

Moreover, the assessment lacks consideration of intangible cultural heritage, including the Gaelic language, traditions, and the deep-rooted relationship between the community and the coastal environment. These elements are integral to the area's identity but are completely omitted from the assessment, representing a significant deficiency. The failure to account for these factors prevents a proper understanding of the cultural impacts of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which possesses a unique cultural identity akin to that of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and contravenes established principles of participation in matters affecting cultural and environmental interests.

A critical procedural oversight is the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The failure to conduct this assessment means that the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these deficiencies place the proposal in direct conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, alongside the failure to recognise living cultural practices, illustrates a clear departure 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 fails to provide a sufficient basis for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment raises serious concerns regarding its adequacy and legality. Although the developer engaged local residents through focus groups, the comprehensive report remains unpublished, creating a significant evidential gap. This omission obstructs the public and the competent authority from grasping the full scope of social risks highlighted by the developer's own research.

Residents are reportedly experiencing measurable levels of stress, anxiety, and concern directly linked to the scale and proximity of the proposed development. These impacts stem from actual engagement rather than speculation. However, without access to the complete assessment, the ability to scrutinise these findings is severely limited, thereby hindering the determination of their relevance within the decision-

making process.

Furthermore, there is indication that the proposal is viewed as a direct threat to community identity and cohesion, with findings of "cultural loss" emerging from the developer's own investigations. Yet, these social impacts have not been adequately addressed in the main application, nor have they been afforded the necessary consideration. The withholding of the entire Social Impact Assessment conceals the genuine human and social cost associated with the development.

This situation critically undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this magnitude, especially when community character and functionality are potentially affected. By failing to disclose the complete dataset, the application lacks a comprehensive evidential foundation for weighing benefits against harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments must promote positive health outcomes and avoid negative impacts, yet the available evidence indicates existing adverse effects that have not been transparently reported. Without the full assessment, it is impossible to establish compliance with this policy.

The procedural ramifications are significant, as the competent authority cannot conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This represents a critical omission within the application and demonstrates a failure to meet the evidential standards of the Environmental Impact Assessment framework.

Ultimately, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing negative impacts, leads to an incomplete and unreliable evaluation. This situation obstructs a lawful determination and reinforces the conclusion that the application is not substantiated by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal to introduce large-scale turbines near the West Lewis coastline presents immediate and serious risks to both the environment and cultural heritage. This region is characterised by its open Atlantic horizon, undeveloped landscape, and a profound sense of remoteness. The placement of turbines in such proximity to the shoreline would create a persistent industrial presence, fundamentally transforming the landscape in a permanent and irreversible manner.

The assessment of visual impacts associated with this development is critically flawed, failing to convey the full extent of the proposed changes. The size and location of the turbines would lead to their dominance in views from residential areas, historic sites, and popular coastal locations. Consequently, this would severely diminish visual amenity and undermine the essential qualities of naturalness and remoteness. The lack

of an adequate representation of this impact, particularly within such a delicate landscape, is deeply concerning.

Moreover, there are significant methodological shortcomings regarding the selection and presentation of visual viewpoints. Current evidence indicates that the chosen viewpoints do not effectively encompass the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and valued landscapes. This raises the possibility that the visual impact has been underestimated, thus compromising the overall reliability of the assessment.

Additionally, the evaluation fails to address the intricate relationships between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are interlinked with the wider landscape, sharing visual and spatial connections with the Atlantic horizon. By treating these heritage assets as isolated elements, the assessment neglects their interdependence, resulting in an incomplete understanding of their settings 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 is not only a matter of visual intrusion but also signifies broader cultural and spatial harm that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, which mandates the protection of natural environments and historic sites. The anticipated changes are at odds with the need to preserve landscape character, visual amenity, and the context of culturally significant locations. The lack of a comprehensive worst-case assessment further weakens any assertions of compliance with policy requirements.

It is evident that the impacts identified are not capable of effective mitigation. Given the scale, height, and proximity of the turbines, their presence would be unavoidable and overwhelmingly dominant. The resulting changes are thus fundamental and permanent, incapable of being reduced to an acceptable level through mitigation strategies.

In summary, the assessment inadequately represents the scale of impact, the environmental sensitivity, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this important landscape.

CONSTRUCTION AND POLLUTION RISKS

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

control, or monitor these risks.

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

There is considerable uncertainty regarding the scale and behaviour of sediment plumes generated by seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also encompasses potential effects on marine species and habitats that are already recognised as sensitive within the wider assessment.

Moreover, the absence of detailed emergency response procedures intensifies these issues. By postponing contingency planning until after consent, the application fails to allow for evaluation of whether adequate safeguards are in place to address pollution incidents. This approach not only introduces procedural risk but also undermines the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements outlined by the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to consent, and without this information, a lawful determination cannot be achieved. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application presents a number of deficiencies regarding the assessment of fisheries and marine life, resulting in an incomplete and unreliable evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not sufficiently demonstrate that these vital uses and habitats can be protected or maintained without causing significant disruption.

A notable flaw lies in the assumption that fishing activity can be displaced without

consequences. The application fails to provide any evidence indicating that alternative fishing grounds are available, accessible, or able to support the added pressure that displacement would create. This oversight is critical, as it raises concerns about potential overfishing in other areas and the possible economic ramifications for the local fishing fleet. Consequently, the impacts on fisheries and livelihoods remain inadequately understood.

The proposal also poses substantial risks to marine species due to underwater noise generated during construction activities. High-energy hammer piling, expected to occur over extended periods, is likely to cause disturbance across vast distances, particularly affecting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application minimises the importance of these effects without adequate supporting evidence.

Moreover, there exists a contradiction within the application, where the requirement for licences to allow harm to European Protected Species is acknowledged, while simultaneously claiming that the impacts are negligible. This inconsistency undermines the credibility of the assessment and raises significant questions regarding compliance with the Habitats Regulations, especially when harm is expected to a degree that necessitates legal authorisation.

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

From a policy standpoint, the application does not establish compliance with the National Planning Framework 4 or the National Marine Plan. It lacks the necessary demonstration that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby obstructing any conclusion regarding the proposal's alignment with sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of 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 shaping the area’s cultural identity, environmental quality, and tourism potential. The proposed development would introduce permanent red aviation lighting that is visible over long distances, creating an intrusive and continuous “wall of light” effect across the western horizon. This alteration would significantly disrupt the night-time environment, yet the application fails to assess the implications of such lighting on visual amenity, landscape character, or the experiences of local residents and visitors.

The absence of an evaluation of impacts on nocturnal wildlife is particularly

concerning. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting, which can cause disorientation and increase the risk of collision. The proposal does not include a lighting impact assessment or a study on phototaxis, neglecting to consider how the introduction of aviation lighting may affect these vulnerable species or lead to increased mortality.

Compounding this issue is the reliance on daytime survey data in the ornithological assessment, which fails to capture the nocturnal activities and associated risks faced by species such as Kittiwakes, known to forage or migrate at night. This lack of site-specific night-time data presents a critical gap in understanding the ecological impacts of the proposal.

Without an assessment of the nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites could be adversely impacted. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, necessitating the application of the precautionary principle and thereby precluding a lawful determination.

From a policy standpoint, these omissions contradict National Planning Framework 4, which emphasises the importance of protecting natural places and maintaining environmental quality. Additionally, they undermine a comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is an essential component of the overall ecology.

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

TOURISM

The analysis of tourism impacts within the application is fundamentally inadequate, failing to properly assess the economic and social ramifications for a crucial sector of the Isle of Lewis's economy. With tourism significantly relying on the area's wild coastline, near-pristine landscapes, dark skies, and unique sense of remoteness, it is notable that 86% of visitors are attracted primarily by scenery. Nevertheless, the application lacks a quantified assessment regarding how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

The tourism sector has seen substantial growth, increasing from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and comprising up to 16% of the island's economy. However, the application neglects to model the potential impacts of the seascape's industrialisation and the consequent loss of environmental quality on Tourism Gross Value Added and the wider economic resilience of the region. Such an analysis is crucial to ascertain whether the proposed development would yield a net economic benefit or instead jeopardise an established and thriving sector.

Furthermore, the assessment does not take into account the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience, as well as to emerging markets such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this oversight, resulting in a substantial gap in understanding the impacts on a recognised and expanding segment of the local economy.

In a context where the island community exhibits limited economic diversification, the lack of evaluation regarding tourism impacts carries broader consequences for employment, local businesses, and the sustainability of the community. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been examined, as mandated by the Islands (Scotland) Act 2018.

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

In summary, the overall inadequacy in quantifying tourism impacts, failing to assess the environmental factors influencing visitor behaviour, and disregarding the economic dependency of the island results in a significant evidential gap. This ultimately hinders a thorough evaluation of economic effects and supports the assertion 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 as set out by statutory duties, national policy, and evidential standards. It brings to light the same core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a major concern. This new application is presented under an even stronger policy framework, which now emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis for the proposal, marked by critical gaps in baseline data and the ongoing use of an undefined design envelope. The reliance on unspecified mitigation measures is concerning, as is the omission of key impact pathways related to nocturnal wildlife, full onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete and fails to provide a thorough understanding of the likely significant effects or residual impacts of the development.

Procedurally, the application demonstrates clear shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory

duty under the Islands (Scotland) Act 2018, while the failure to fully disclose the Social Impact Assessment represents a material omission. These issues hinder the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unfit for determination.

Moreover, the proposal contradicts the National Planning Framework 4. It does not adequately protect biodiversity, natural places, or cultural heritage and fails to demonstrate that health and wellbeing impacts are acceptable. The absence of tourism impact modelling further undermines claims of net economic benefit. The cumulative effects of both offshore and onshore elements have not been properly assessed, obscuring the potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounds the environmental risks associated with the proposal. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain areas, inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and hindering the ability to lawfully conclude that impacts are acceptable.

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

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

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

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: D64F4815

Member of the public 911

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 marine licensing and Environmental Impact Assessment regulations. The objection arises from a thorough review of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant deficiencies in planning, environmental considerations, cultural implications, and procedural adherence. The development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The proposal's scale, design, and proximity to the shoreline raise serious concerns about its alignment with statutory requirements, national policies, and sustainable development principles.

The application lacks a solid evidential foundation for a lawful determination. There is critical missing environmental data, with limited and inconsistent baseline information, leaving many key elements of the proposal undefined. The use of a flexible design framework obscures the understanding of potential significant effects, and without specific mitigation measures outlined, it is impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

Moreover, there are substantial conflicts with existing policy frameworks. The proposal is 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 public health and wellbeing. It does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests necessary for consent, compromising the authority's ability to determine that the development aligns with policy standards.

Unprecedented in scale for this location, the proposal features large turbines situated in close proximity to the shoreline, raising considerable concerns about landscape capacity, visual impact, and environmental ramifications. In light of the insufficient information provided, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy violations, it is evident that the application is incomplete and unfit for a lawful determination. Therefore, the precautionary principle must be invoked in this case.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate, failing to deliver a thorough, transparent, and dependable account of the environmental consequences of the proposed project. A flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This ambiguity hinders the ability to apply a worst-case scenario consistently, ultimately compromising the integrity of the assessment. As a result, the presented impacts may not accurately reflect the final development, thereby obstructing both public understanding and the competent authority's ability to gauge the true extent of environmental effects.

Significant reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans is evident in the application. Seeking consent on the premise that environmental harm will be mitigated at a future date precludes any meaningful evaluation of effectiveness or residual impacts. This postponement of critical information to post-consent phases is procedurally unacceptable, conflicting with the aims of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation are clearly defined prior to determination.

Evidential deficiencies are also present, with noticeable gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This situation creates uncertainty about the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are made without solid supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot align with statutory requirements.

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

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

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives within the application is fundamentally inadequate and fails to fulfil the statutory obligations set by the Environmental Impact Assessment regime. It does not provide a structured or reasoned evaluation of viable alternatives based on environmental implications. Instead, the application merely offers a narrative description of the project's development. This method does not demonstrate that less

harmful alternatives have been properly identified, assessed, and chosen over more damaging options.

There is a notable absence of transparent, evidence-based comparisons regarding offshore locations, development scales, or design configurations. The application does not convincingly show that the developer has genuinely explored the possibility of positioning turbines further offshore, an option that could likely minimise visual, ecological, and coastal impacts. The West Lewis coastline's sensitivity, along with the critical relevance of proximity to shore in determining environmental impact, underscores the significance of this lack of analysis. Consequently, it is impossible to ascertain whether the proposed siting is indeed the least damaging option available.

This inadequacy extends to the examination of cable routing and landfall assessment. There is insufficient evidence that alternative routes have been explored adequately to avoid or lessen impacts on sensitive areas, including culturally and spiritually significant sites like Barvas Cemetery. The absence of a defined strategy for avoidance and the lack of comparative analysis suggest that mitigation through design has not been employed, relying instead on measures to mitigate after the design phase.

The failure to demonstrate that environmental harm has been minimised through appropriate site selection, layout, and routing of infrastructure signifies a disregard for the established mitigation hierarchy. This shortcoming prevents the competent authority from determining the existence of less harmful and more suitable alternatives. Without a comprehensive assessment of alternatives, it cannot be affirmed that the proposal presents a sustainable or policy-compliant solution.

From a policy viewpoint, this deficiency raises significant concerns regarding compliance with National Planning Framework 4, especially in terms of safeguarding natural areas, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment constitutes a material omission that supports the conclusion that the application has not been sufficiently evaluated, thus cannot be legally determined.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is severely lacking, resulting in an incomplete understanding of the ecological receptors within the West Lewis coastal environment. This region is a biologically active marine system, yet the baseline data provided is insufficient, and the methodologies utilised do not adequately capture the presence, behaviour, and habitat use of various species. Consequently, the assessment fails to offer a solid evidential basis for evaluating potential impacts.

A notable shortcoming is the treatment of otters, classified as a European Protected Species. The application neglects to acknowledge and assess their active utilisation of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns leads to an inadequate assessment of the potential effects from construction disturbances, noise, and increased activity. This gap undermines the

conclusions drawn regarding the absence of significant effects on otters.

Additionally, the assessment of basking sharks suffers from significant deficiencies, particularly due to the reliance on aerial surveys, which introduce considerable detection bias in 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 include or adequately consider such data results in an incomplete baseline, diminishing the reliability of the conclusions reached.

These methodological shortcomings mean that the conclusions of negligible or non-significant effects rest on assumptions rather than solid evidence. Moreover, the lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the actual level of risk posed to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

A critical contradiction exists within the application; the developer asserts that there will be no significant adverse effects while simultaneously putting forth a Habitats Regulations derogation case, which is only necessary when significant harm is expected. This inconsistency raises questions about the reliability of the assessment and indicates that its conclusions are not backed by the underlying evidence. Furthermore, the assessment lacks sufficient evidence to confirm that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will remain

unaffected. The significance of these feeding grounds is not fully recognised, and reliance on modelling approaches introduces uncertainty, particularly for declining species such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially given the incomplete baseline data and the lack of comprehensive understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor poses an additional risk, creating a barrier in a primary flight path used by species travelling between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of sustained mortality within this corridor or the potential consequences for species with relatively small global populations. From a regulatory perspective, the application does not meet the evidential threshold required to ascertain that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and modelling limitations, means that the standard of beyond reasonable scientific doubt has not been satisfied. This situation engages the precautionary principle, obstructing a lawful conclusion in favour of consent.

These deficiencies 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 directly conflicts with national policy. Collectively, the assessment is deemed unreliable due to methodological weaknesses, internal inconsistency, and insufficient evidence. These shortcomings hinder a thorough evaluation of impacts and contribute to the overall determination that the application does not meet the statutory requirements necessary for support.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal presented fails to adequately assess cultural heritage and community identity, overlooking the West Lewis coastline as a vibrant cultural landscape that intricately links environment, language, tradition, and community. The assessment adopts an overly simplistic view, treating heritage as a collection of separate, static assets instead of recognising their continuing social, cultural, and spiritual significance within the community.

There is a notable shortcoming in how culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are addressed. These locations serve as active sites of burial and spiritual practice, yet the assessment reduces them to mere static features, neglecting their ongoing use and meaning, as well as the potential impacts of development on their surroundings. This misrepresentation leads to an incomplete understanding of the cultural implications and disregards the sites' importance in community life.

The intangible aspects of cultural heritage are also not considered, with the assessment omitting critical elements like the Gaelic language, traditions, and the deep-rooted relationship between the community and the coastal environment. These factors are vital to the area's identity, yet their exclusion signifies a major oversight.

Without addressing these elements, the cultural impact of the development remains inadequately assessed.

Concerns extend to community rights and engagement. The Gaelic-speaking population has a unique cultural identity and is recognised as an Indigenous People, yet the process of Free, Prior and Informed Consent has not been followed. This lack of genuine engagement calls into question the credibility of the assessment and fails to adhere to established principles of participation regarding decisions that affect cultural and environmental interests.

Furthermore, a significant procedural error arises from the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. Without such an assessment, the relevant authority is unable to meet its legal obligation to evaluate the social, cultural, and economic repercussions on the island community. This oversight alone renders a lawful determination impossible.

From a policy standpoint, the deficiencies in the application are at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, as well as to recognise living cultural practices, constitutes a clear breach of policy requirements.

Overall, the failure to adequately assess living heritage, intangible cultural value, community rights, and essential statutory obligations creates a significant evidential gap. The cultural impacts of the proposed development have not been thoroughly examined, and the application does not provide a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing assessment associated with the proposal is fundamentally inadequate and lacks the necessary transparency for a valid evaluation. Although the developer has commissioned a Social Impact Assessment, which included engaging with local residents through focus groups, the absence of the full report creates a significant evidential gap. This gap hampers both public understanding and the competent authority's ability to grasp the comprehensive social risks identified in the developer's own research.

Residents are reportedly experiencing measurable levels of stress, anxiety, and concern linked to the scale and proximity of the proposed development. These impacts stem from direct engagement rather than speculation. However, the withholding of the complete assessment stifles thorough scrutiny of the findings and restricts the capacity to evaluate their importance in the decision-making process.

Additionally, there is notable 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. Nevertheless, these adverse impacts have not been sufficiently

incorporated into the main application or accorded the necessary weight. The lack of access to the full Social Impact Assessment effectively obscures the real human and social costs of the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A full understanding of the social, economic, and health implications is vital for developments of this magnitude, especially when community character and functioning could be at stake. The failure to provide the complete dataset means the application does not offer a thorough evidential basis to assess the balance between potential benefits and harms.

From a policy standpoint, the application does not illustrate compliance with the National Planning Framework 4 regarding health and wellbeing. Development should foster positive health outcomes and mitigate harm; however, the available evidence highlights existing adverse effects that remain undisclosed. Without the full assessment, it cannot be established that the application adheres to this policy.

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

In summary, the non-disclosure of the complete Social Impact Assessment, together with the documented existing adverse impacts, leads to an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual and landscape impacts associated with the proposed development is significantly lacking and does not sufficiently account for the degree of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its expansive Atlantic horizon, its undeveloped nature, and a pronounced sense of remoteness. The introduction of large-scale turbines situated near the shoreline would lead to a continuous and overpowering industrial presence, fundamentally changing this character and resulting in a permanent and irreversible alteration of the landscape.

Furthermore, the application does not accurately depict the extent of this visual change. Given the scale and proximity of the turbines, they would dominate the views from residential areas, historic sites, and popular coastal locations. This would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately reflect the significance of these impacts within the context of such a sensitive landscape.

Methodological issues also arise concerning the choice and presentation of visual

viewpoints. Evidence indicates that the selected viewpoints may fail to adequately represent the most sensitive receptors or extreme scenarios, particularly in connection with key cultural heritage sites and areas of high landscape value. This raises concerns that the magnitude of visual impact has been understated, thereby undermining the reliability of the assessment.

Another critical shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are integrated into a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated entities, neglecting their interdependence and leading to an incomplete analysis of the impacts on their context and cultural significance.

The industrialisation of the seascape would sever these vital connections, changing the environment in which heritage assets are perceived and disrupting their relationship with the natural horizon. This presents not only a visual impact but also a deeper cultural and spatial damage that has not been thoroughly evaluated in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4 regarding the preservation of natural areas and historic assets. The extent of change is incompatible with the requirements to protect landscape character, visual amenity, and the setting of culturally important sites. The lack of a thorough worst-case scenario assessment further undermines any assertions of policy compliance.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would result in a dominant and unavoidable presence. Consequently, the resulting changes are fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation measures.

In summary, the assessment fails to accurately depict the magnitude of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and underscore the conclusion that the proposal is incompatible with the safeguarding of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns regarding the adequacy of the assessment of construction and pollution risks, which remains incomplete and lacks the necessary detail for evaluating the potential environmental effects. With substantial seabed preparation and installation works taking place in a high-energy Atlantic environment, the absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans is particularly troubling. The application appears to depend on the preparation of mitigation and contingency measures post-consent, which inhibits any meaningful assessment of their efficacy.

This reliance on undefined future measures is especially alarming given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are at risk of sediment disturbance and contamination. Although the application acknowledges risks, such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

There is also considerable uncertainty surrounding 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 impacts of these disturbances. This uncertainty extends to potential effects on marine species and habitats that have already been identified as sensitive within the wider assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application prevents a thorough evaluation of whether appropriate safeguards will be in place to address pollution incidents. This creates procedural risks and undermines the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral 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 granting consent; absent this information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with relevant policy requirements concerning environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, absence of detailed management plans, and uncertainty about potential impacts culminate in a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks, further substantiating the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The application lacks a thorough assessment of fisheries and marine life, failing to provide a robust evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry; however, the proposal does not adequately demonstrate that these vital uses and habitats can be protected or maintained without causing significant disruption.

One major concern lies in the assumption that fishing activities can be displaced without negative consequences. The application offers no evidence that alternative fishing grounds are available, accessible, or capable of accommodating increased pressure. This absence of information is critical, as displacement may lead to

overfishing in other areas and could have broader economic implications for the local fishing fleet. In the absence of a clear and evidence-based evaluation, understanding the impacts on fisheries and local livelihoods becomes impossible.

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 a prolonged period is likely to disrupt marine life across large distances, impacting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application appears to minimise the significance of these effects, lacking sufficient supporting evidence.

Furthermore, there is a troubling inconsistency within the application, as it acknowledges the need for licences to permit harm to European Protected Species while simultaneously characterising these impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious questions regarding compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Additionally, the assessment does not account for cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is necessary to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 and the National Marine Plan. It does not adequately show that the development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, thus hindering any conclusion that the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents significant deficiencies in its assessment of onshore infrastructure, which is critical to understanding the complete impact of what is essentially a single integrated project. The offshore turbines and the associated onshore works are interconnected, yet they are evaluated separately. This fragmented approach obscures the true scale of the environmental and socio-economic effects involved.

Onshore works encompass the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. These activities involve excavation in areas of deep peat,

notably within Barvas Moor, which is not only a vital carbon store but also an ecologically delicate habitat. The assessment fails to provide a thorough evaluation of these impacts, hampering a complete understanding of the project's overall environmental footprint.

Moreover, the omission or postponement of the assessment concerning onshore impacts hinders the ability to evaluate cumulative effects properly. The Environmental Impact Assessment process is designed to consider all components of a project collectively; however, the disparate treatment of offshore and onshore elements leaves the combined impacts on peatlands, habitats, and local communities inadequately understood.

There are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are under policy protection. The application does not show that it has fully assessed the impacts on these habitats or that suitable avoidance measures have been put in place, resulting in a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding the carbon balance as the disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts renewable energy development goals. This issue has not been adequately addressed in the application, nor is there sufficient demonstration that the overall carbon balance remains advantageous.

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, calling into question the deliverability and lawful implementation of the project.

From a policy standpoint, the failure to assess the project comprehensively and to demonstrate the protection of peatlands, habitats, and land use interests is at odds with the National Marine Plan and National Planning Framework 4. The inability to 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 part of the application incomplete and unreliable, thereby preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are crucial 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, which represents a material omission. The proposal includes the introduction of permanent red aviation lighting that would be visible over long distances, creating a continuous and intrusive "wall of light" effect across the western

horizon, fundamentally altering the night-time environment.

The application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of assessment is particularly concerning given the significance of dark skies to the region's identity and the potential growth of sectors such as astro-tourism. This gap in the overall landscape and environmental assessment is substantial.

Moreover, there is no analysis of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can result in disorientation and an increased risk of collision. The application lacks any lighting impact assessment or phototaxis study, failing to consider how aviation lighting may affect these species or contribute to mortality rates.

This oversight is further aggravated by the dependence on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or the associated risks. For instance, Kittiwakes, which may forage or migrate at night, could also be disoriented by artificial lighting; however, this risk has not been evaluated. The absence of site-specific night-time data creates a critical gap in understanding ecological impacts.

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

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

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

TOURISM

The application overlooks the critical assessment of tourism impacts, failing to evaluate the economic and social implications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region’s wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Despite the application noting that 86% of visitors are attracted by scenery, it lacks a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or overall economic

contributions.

Tourism has experienced considerable growth, increasing from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. Nevertheless, the application does not evaluate how the industrialisation of the seascape and the potential loss of environmental quality could affect Tourism Gross Value Added or the wider economic resilience of the area. Without such vital analysis, it remains unclear whether the proposed development would yield a net economic benefit or potentially harm an established and expanding sector.

Furthermore, the assessment neglects to address the importance of environmental quality in enhancing tourism, particularly the significance of unspoiled landscapes and dark skies for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this deficiency, creating a substantial gap in understanding the impacts on a recognized and growing aspect of the local economy.

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

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

Collectively, the shortcomings in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and considering the island's economic dependency lead to a significant evidential gap. This hinders a thorough evaluation of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm 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

I visit this area frequently to enjoy the pristine landscapes and marine life. I admire what this area has been achieving in terms of environmental improvements. This application

whilst supporting renewable energy does so at the significant detriment to other parts of the environment. For those supporting renewable energy this is counter intuitive to effectively managing our climate crisis and as such, I vehemently oppose this plan.

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: 888ECD49

Member of the public 912

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the appropriate marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report alongside other supporting documents, revealing significant deficiencies relating to planning, environmental aspects, cultural considerations, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. Concerns are raised regarding the compatibility of the proposal's scale, proximity, and design with existing statutory requirements, national policies, and the tenets of sustainable development.

The application does not furnish an adequate evidential basis necessary for a lawful determination. It lacks critical environmental data, and the baseline information provided is both limited and inconsistent, with several key elements of the proposal remaining undefined. The application's use of a flexible design framework obfuscates the potential significant effects, while the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining the claims of negligible or non-significant effects due to a lack of robust supporting evidence.

There exist clear and significant conflicts with policy. The proposal shows inconsistencies with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not establish that the national requirements for safeguarding biodiversity, climate interests, and environmental integrity will be fulfilled. These discrepancies directly challenge the statutory tests necessary for consent, thereby compromising the ability of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal introduces large turbines situated in close proximity to the shoreline, which raises substantial concerns regarding the landscape capacity, visual dominance, and environmental impact. Collectively, the insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance illustrate that the application is incomplete and cannot sustain a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application presents a number of serious deficiencies that collectively undermine its validity. The reliance on an undefined Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This lack of clarity obstructs the ability to apply a worst-case scenario consistently, thereby compromising the integrity of the Environmental Impact Assessment Report. As a result, the environmental impacts outlined may not accurately reflect those of the final development, depriving both the public and the competent authority of a proper understanding of potential environmental effects.

Moreover, the application is overly dependent on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the assumption that environmental harm will be managed later is inappropriate, as it precludes a meaningful evaluation of these measures' effectiveness or the assessment of any residual impacts. This deferral of critical information to post-consent stages contradicts the core objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be established prior to determination.

Significantly, there are notable evidential gaps, including a lack of comprehensive baseline data and methodological limitations, along with a reliance on assumptions rather than site-specific evidence. These shortcomings lead to uncertainty regarding the magnitude and significance of impacts. The presentation of conclusions asserting negligible or non-significant effects without robust supporting data further obscures understanding. The lack of sufficient information hinders clarity on cumulative and worst-case impacts, introducing a level of scientific uncertainty that is inconsistent with statutory requirements.

As a result, the application does not meet the evidential threshold mandated under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to satisfy the requirements of National Planning Framework 4, particularly those related to biodiversity protection and environmental integrity. The inability to demonstrate that impacts have been fully assessed or that appropriate safeguards exist is evident.

In conclusion, 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 unreliable and incomplete. These critical deficiencies prevent a lawful and thorough assessment of environmental effects, leaving the competent authority ill-equipped to make an informed decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The marine ecology and protected species assessment lacks the necessary completeness and reliability to fully understand the ecological receptors present in the West Lewis coastal environment. This region is both sensitive and biologically active;

however, the baseline data is inadequate, and the methodologies employed do not effectively capture species presence, behaviour, and habitat use. Consequently, the assessment fails to establish a robust evidential foundation for evaluating potential impacts.

Among the critical shortcomings is the insufficient recognition and assessment of otters, a European Protected Species, which actively utilise coastal areas for foraging and movement. The assessment neglects to account for their core foraging range and behavioural patterns, leading to an inadequate evaluation of how construction disturbance, noise, and increased activity might affect them. This significant omission undermines any conclusions regarding the lack of considerable effects on the species.

Additionally, there are notable deficiencies in the assessment of basking sharks, with the reliance on aerial surveys creating a substantial detection bias, particularly under Atlantic conditions. This methodological choice is likely to lead to an underestimation of their presence, especially when juxtaposed with established land-based observations that indicate frequent use of these waters. The failure to incorporate or appropriately consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological limitations highlighted result in a reliance on assumptions rather than sound evidence, particularly regarding conclusions of negligible or non-significant effects. Furthermore, the absence of comprehensive baseline data hampers the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment regime or National Planning Framework 4, as it has not adequately identified or assessed the protected species present. The uncertainty introduced by these deficiencies prevents the dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is not lawful to grant consent.

In summary, the amalgamation of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, reinforcing the 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 this application is significantly flawed, presenting substantial gaps in evidence and internal inconsistencies that undermine its conclusions. The development is situated within key foraging areas and migratory

pathways, yet the assessment does not adequately evaluate the potential implications of displacement, collision risk, or habitat loss for these species.

A critical contradiction arises within the application, as the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is necessitated only when significant harm is anticipated. This inconsistency raises questions about the assessment's reliability and suggests that the conclusions drawn are not substantiated by the supporting evidence. Furthermore, the assessment fails to provide sufficient information regarding the seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, and does not fully consider the importance of these feeding grounds. The reliance on modelling approaches introduces further uncertainty, especially for species that are in severe decline, such as Kittiwakes and Fulmars. The methodologies used likely underestimate mortality rates, particularly where baseline data is lacking and behavioural responses remain unclear.

The placement of turbines within a recognised migratory corridor adds another layer of significant risk, effectively creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not adequately address the long-term implications of sustained mortality in this corridor or the potential consequences for species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to determine no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This invokes the precautionary principle and prevents a lawful conclusion in favour of consent. Additionally, the identified deficiencies constitute a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will remain unaffected places the proposal at odds with national policy.

Overall, the assessment is unreliable due to internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. These issues hinder a thorough evaluation of impacts and contribute 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 related to the proposed development is fundamentally flawed, particularly regarding the West Lewis coastline, which should be recognised as a vibrant cultural landscape where community, tradition, language, and environment are deeply intertwined. The application reduces heritage to mere static assets, neglecting their active social, cultural, and spiritual relevance within the community.

Significantly, the assessment fails to accurately address culturally important sites such

as the cemeteries at Dalmore, Bragar, and Barvas. These locations are not merely historical features; they serve as active sites for burial and spiritual activities. By classifying them as static, the evaluation overlooks their ongoing significance and the implications of development on their surroundings. This misrepresentation leads to a lack of thorough analysis concerning cultural effects and dismisses their importance in community life.

Moreover, the application neglects the evaluation of intangible cultural heritage, which encompasses the Gaelic language, traditional practices, and the enduring connection between the community and the coastal environment. These aspects are vital to the area's identity yet are completely omitted from the assessment, marking a crucial gap. Without accounting for these elements, a true understanding of the cultural impact of the development remains unattainable.

Concerns regarding community rights and engagement also arise. The Gaelic-speaking community possesses a unique cultural identity as an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement calls into question the validity of the assessment and fails to uphold established principles for participation in decisions that affect cultural and environmental interests.

A crucial procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, required under the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority's ability to lawfully assess the social, cultural, and economic implications of the proposal on the island community. This alone renders a lawful determination impossible.

These inadequacies place the proposal in clear opposition to the National Planning Framework 4, especially regarding the protection of historic assets and sites. By neglecting both tangible and intangible heritage and failing to recognise living cultural practices, the application diverges significantly from policy expectations.

Overall, the failure to adequately assess living heritage, intangible cultural values, community rights, and statutory responsibilities results in a considerable evidential gap. The cultural implications of the development remain improperly evaluated, and the application does not provide a sound foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing in relation to the proposal is significantly inadequate and lacks the necessary transparency for a lawful assessment. The developer engaged in a Social Impact Assessment that included focus groups with local residents; however, the complete report has not been made available. This represents a critical evidential gap, hindering both public understanding and the competent authority’s ability to grasp the full range of social risks identified through the developer's own investigations.

Residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development, as indicated by available summaries. These impacts stem from direct engagement and thus are based on factual evidence rather than speculation. Nonetheless, the failure to release the full assessment limits scrutiny of the findings and restricts the capacity to evaluate their significance in the decision-making process.

Furthermore, there is a perception that the proposal threatens community identity and cohesion, with “cultural loss” noted in the developer’s findings. Despite these serious implications, they have not been adequately considered in the main application or given the necessary weight. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency has broader implications for the Environmental Impact Assessment process. A thorough understanding of social, economic, and health effects is crucial for developments of this magnitude, especially where community character and functioning may be disrupted. The absence of the complete dataset means that the application does not provide a comprehensive evidential basis for weighing the benefits against the harms involved.

From a policy standpoint, the application falls short of demonstrating adherence to National Planning Framework 4 regarding health and wellbeing. Development should foster positive health outcomes and mitigate harm, yet the evidence presented indicates existing adverse effects that remain undisclosed. Without the full assessment, compliance with this policy cannot be validated.

The procedural consequences are substantial. 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 oversight in the application and a failure to fulfill the evidential standards mandated by the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, alongside evidence of existing negative impacts, renders the evaluation incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

CONSTRUCTION AND POLLUTION RISKS

The application for the proposed construction raises significant concerns due to its incomplete assessment of construction and pollution risks. Substantial seabed preparation and installation works are planned within a high-energy Atlantic environment, yet there is a notable absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures to be devised after consent, which hinders a thorough evaluation of their adequacy or effectiveness.

Particularly alarming is the reliance on undefined future measures, especially given the delicate nature 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 recognises risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide adequate detail on prevention, control, or monitoring strategies.

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

Compounding these issues is the lack of detailed emergency response procedures, which raises additional concerns. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether appropriate safeguards are in place to address pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the critical determination stage.

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

In summary, the lack of defined mitigation measures, insufficient management plans, and uncertainty surrounding potential impacts result in a materially deficient assessment. These failures impede a comprehensive evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposed application raises significant concerns regarding its assessment of fisheries and marine life. The waters off the West Lewis coast are home to a diverse marine ecosystem and a vibrant fishing industry, yet the evaluation does not adequately address how these essential habitats and activities will be protected or maintained.

A critical flaw in the assessment is the assumption that fishing can be relocated without negative effects. There is no evidence provided that alternative fishing grounds exist or are capable of sustaining the added pressure from displaced activities. This lack of information is crucial, as such displacement could lead to overfishing in different areas and have broader economic repercussions for the local fishing fleet. Without a thorough and evidence-based evaluation, the impacts on both fisheries and

local livelihoods remain unclear.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise generated by construction activities. The use of high-energy hammer piling for extended periods is likely to disturb marine life over considerable distances, notably affecting species like dolphins. The anticipated disturbance to a large portion of the local bottlenose dolphin population raises serious issues. However, the application appears to minimise these concerns without providing adequate supporting evidence.

There is also a notable inconsistency in the application regarding the necessity of licences for any harm to European Protected Species. While it acknowledges the need for legal authorisation where harm is anticipated, it simultaneously asserts that the impacts are negligible. This contradiction calls into question the reliability of the assessment and raises issues about compliance with the Habitats Regulations.

Furthermore, the evaluation does not adequately consider the cumulative impacts from various pressures, such as habitat disruption, 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 application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not show that the proposed development can coexist with current marine users or avoid significant negative impacts on marine biodiversity, which obstructs any conclusion that it represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is insufficient and fails to encompass the full range of impacts from a project that should be considered as a cohesive whole. The offshore turbines and the onshore works are inherently connected, yet their evaluation occurs separately, leading to a disjointed analysis that masks the true extent of environmental and socio-economic consequences.

Onshore components include cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure that traverses sensitive landscapes. These activities necessitate excavation 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, obstructing a comprehensive understanding of the project's environmental footprint.

By failing to address the onshore impacts adequately, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project elements are assessed collectively; however, the disjunction between offshore and onshore evaluations leaves the combined repercussions on peatlands, habitats, and local communities inadequately explored.

There are notable risks to sensitive habitats, such as machair systems and peatland environments, which receive policy protection. The application does not sufficiently show that 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.

Furthermore, the routing of infrastructure through active croft land raises potential conflicts with established land use and legal rights. The application fails to provide evidence that the requisite consents or processes have been initiated, bringing into question the deliverability and legal compliance of the project.

From a policy viewpoint, the lack of a comprehensive assessment of the project as a unified entity, alongside insufficient demonstration of protection for peatlands, habitats, and land use interests, is in direct conflict with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further weakens the application.

Overall, the separation 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, preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal presents a significant evidential gap due to the absence of assessments concerning dark skies and nocturnal wildlife, which are crucial components of the Environmental Impact Assessment. The exceptionally dark skies of the West Lewis coastline contribute to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, visible over long distances, is set to create a continuous and intrusive "wall of light" effect across the western horizon. This alteration of the night-time environment raises concerns regarding visual amenity, landscape character, and the experiences of residents and visitors.

Furthermore, there is a critical lack of evaluation regarding the impacts of this lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can lead to disorientation and increased risks of collision. The application notably lacks a lighting impact assessment or a phototaxis study, failing to address how the proposed aviation lighting may impact these vulnerable species or potentially raise mortality rates.

The shortcomings are exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not adequately capture nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate during the night, are similarly at risk of disorientation due to artificial lighting; however, this risk remains unassessed. The lack of site-specific night-time data creates an essential gap in understanding the ecological impacts of the proposal.

As a result, it is impossible to ascertain whether protected species or designated sites would be adversely affected without a thorough assessment of nocturnal impacts. The application fails to meet the required evidential standard to exclude adverse effects beyond reasonable scientific doubt, engaging the precautionary principle and preventing a lawful determination.

In terms of policy, the omission contradicts the National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, it undermines the broader assessment of landscape and seascape impacts, as the character of the night environment is an integral aspect of the overall ecological setting.

In summary, the absence of any assessment focused on dark skies and nocturnal wildlife reveals significant flaws in the application. The lack of baseline data, impact modelling, and species-specific analysis renders it incomplete, thus incapable of supporting a lawful determination.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm embodies a significant failure to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. It echoes the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a key concern. This current proposal is now presented under a policy framework that should place even greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are considerable gaps in the baseline data provided, alongside the use of an undefined design envelope and reliance on unspecified mitigation measures. Important impact pathways have been omitted, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment is deficient and does not allow for a comprehensive understanding of likely significant effects or residual impacts.

Procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment breaches statutory requirements under the Islands (Scotland) Act 2018, while the failure to provide a complete 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 unsuitable for determination.

In terms of compliance with National Planning Framework 4, the proposal is fundamentally at odds with requirements. It does not adequately protect biodiversity, natural places, or cultural heritage, fails to demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to insufficient tourism impact modelling. Furthermore, the cumulative impacts of both offshore and onshore components have not been sufficiently assessed, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties remain around environmental risks, which could be significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and hindering a lawful determination that impacts are acceptable.

This proposal would result in extensive and irreversible alterations 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 adequately.

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, combined with conflicts with policy and unresolved environmental risks, inhibit a lawful, evidence-based decision. The competent authority is urged to refuse consent for this application or to invoke relevant regulatory provisions to compel the submission of the necessary information.

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

Additional Comments

Having Lived on the Isle for 40 years and raising my family there I feel this wind farm is simply nothing but financial gain for foreign companies and our government, they have absolutely no concern for anyone living on the island along with its very fragile ecosystem, this is nothing but pure greed at the cost of those living there and the 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: 6F642E79

Member of the public 913

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.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species is fundamentally flawed, presenting an incomplete and unreliable picture of the ecological receptors in

the West Lewis coastal environment. This marine system is biologically active and highly sensitive, yet the baseline data is inadequate, and the methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of species. Consequently, the assessment falls short in providing a solid evidential basis for understanding potential impacts.

Among the most critical oversights is the failure to properly evaluate otters, which are a European Protected Species. The application neglects to acknowledge and assess their use of coastal areas for foraging and movement. Without consideration of their core foraging range and behavioural patterns, the assessment cannot accurately determine the potential impacts of construction activities, noise, and increased human presence. This absence of analysis undermines the conclusions drawn regarding the significance of effects on this species.

The evaluation of basking sharks also suffers from serious deficiencies. Relying solely on aerial surveys introduces considerable bias in detection, particularly under Atlantic conditions, which may lead to an underestimation of their presence. In contrast, established land-based observations reveal a frequent use of these waters. The failure to incorporate such critical data results in an incomplete understanding of the baseline and diminishes the reliability of the conclusions.

These methodological flaws mean that the assertions of negligible or non-significant effects are largely based on assumptions instead of solid evidence. The lack of adequate baseline data further complicates the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty clouds the true extent of risks to marine species and habitats.

Regulatory requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4 have not been met, as the application fails to identify or assess protected species properly. The resulting uncertainty makes it impossible to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, granting consent is not legally permissible.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions leads to an assessment that is fundamentally unreliable. These shortcomings prevent 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 of the proposed development presents substantial flaws, characterised by significant evidence gaps and internal contradictions that challenge its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. However, the

application does not adequately demonstrate that these species will remain unaffected, failing to meet the necessary evidential standard. The placement of turbines within key foraging areas and migratory pathways raises critical concerns, yet the assessment does not sufficiently evaluate the risks associated with displacement, collision, or habitat loss.

A critical inconsistency arises within the application, wherein the developer asserts that there will be no significant adverse effects while simultaneously submitting a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This contradiction undermines the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence. Furthermore, the assessment lacks adequate proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will not face negative impacts. The significance of these vital feeding grounds is not fully recognised, and reliance on modelling techniques introduces uncertainty, particularly concerning species like Kittiwakes and Fulmars, which are in severe decline. The methodologies used are likely to underestimate mortality, especially in instances where baseline data is insufficient and behavioural responses are not comprehensively understood.

The siting of turbines within a recognised migratory corridor adds another layer of risk, effectively obstructing 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 in this corridor or the potential effects on species with relatively small global populations. From a regulatory standpoint, the application does not satisfy the evidential requirements necessary to affirm no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside data gaps and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been reached. This invokes the precautionary principle and precludes a lawful conclusion in support of consent.

The identified deficiencies also represent 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 opposition to national policy. Collectively, these factors render the assessment unreliable due to methodological shortcomings, internal inconsistencies, and insufficient evidence. Such inadequacies obstruct a thorough evaluation of impacts and contribute to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity within the application is fundamentally flawed and does not recognise the West Lewis coastline as a dynamic cultural landscape. The intrinsic connections between environment, language, tradition, and community are overlooked, leading to a reductionist portrayal of heritage as a collection of isolated, static assets. This approach fails to acknowledge the ongoing social, cultural, and spiritual functions that these elements serve within the

community.

The assessment inadequately treats culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial grounds and places of spiritual significance, yet they are mischaracterised as static features devoid of their continued relevance and the potential impacts of development on their surroundings. This lack of understanding leads to an incomplete evaluation of cultural effects and ignores the cemeteries' vital role in community life.

Intangible cultural heritage, including the Gaelic language, local traditions, and the deep-rooted relationship between the community and its coastal environment, is also neglected in the assessment. These aspects are central to the identity of the area, yet their omission signifies a serious gap in understanding the cultural ramifications of the proposed development.

Moreover, there are significant issues regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity akin to that of Indigenous Peoples, yet the process of Free, Prior and Informed Consent has not been implemented. This lack of meaningful engagement raises serious concerns about the legitimacy of the assessment and fails to adhere to established participatory principles regarding decisions that affect cultural and environmental interests.

A critical procedural oversight is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This assessment is essential for the competent authority to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. The absence of this assessment alone renders the determination unlawful.

From a policy standpoint, the application’s deficiencies stand in stark contrast to National Planning Framework 4, particularly regarding the protection of historic assets and sites. The neglect of both tangible and intangible heritage, along with the disregard for living cultural practices, signifies a blatant departure from policy requirements.

In summary, the combined failures to assess living heritage, intangible cultural value, community rights, and adherence to statutory obligations culminate in a significant evidential gap. The cultural impacts of the proposed development remain inadequately assessed, and the application does not provide a reliable foundation for understanding the true cultural costs associated with it.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of publication of the full Social Impact Assessment is a critical issue that has significant implications for the evaluation of this development proposal. Although the developer engaged local residents through focus groups, the absence of the complete report creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to assess the identified social risks.

Available summaries reveal that residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement with the community, making them grounded in reality rather than speculative. However, without access to the full assessment, proper scrutiny of these findings is impossible, thus limiting the capacity to evaluate their significance in the decision-making process.

Moreover, the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's own findings. Nonetheless, these serious concerns have not been adequately integrated into the main application or given appropriate consideration. The decision to withhold 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 comprehensive understanding of the social, economic, and health impacts is vital for projects of this magnitude, especially when community character and functionality may be at stake. By failing to provide the complete dataset, the application does not offer a thorough evidential basis for weighing the benefits against the potential harms.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. Developments are expected to promote positive health outcomes and mitigate harm, yet the evidence available points to existing adverse effects that remain undisclosed. Without the full assessment, it is impossible to confirm compliance with this policy.

The procedural ramifications are considerable. The competent authority is unable to conduct a rigorous socio-economic and health evaluation in the absence of the full Social Impact Assessment. This constitutes a material omission and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, alongside documented existing adverse impacts, renders the assessment inadequate and unreliable. This situation precludes a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application presents significant deficiencies in its assessment of seascape, landscape, and visual impacts. It fails to accurately reflect the scale of change and the sensitivity of the West Lewis coastline, characterised by its open Atlantic horizon and undeveloped character. The introduction of large-scale turbines near the shoreline would establish a continuous and dominant industrial presence, fundamentally transforming this landscape and resulting in a permanent alteration of its character.

Moreover, the magnitude of visual change is not adequately represented. The scale and proximity of the turbines would dominate views from residential areas, historic sites,

and frequently visited coastal locations, thereby directly impacting visual amenity and eroding the essential qualities of naturalness and remoteness. The assessment lacks a proper conveyance of this level of impact or its significance, given the sensitivity of the landscape.

Methodological issues further exacerbate the assessment's shortcomings, particularly regarding the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints do not sufficiently represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been understated, compromising the reliability of the assessment.

Additionally, the application neglects to assess the interconnectedness of landscape, seascape, and cultural heritage adequately. Notably, significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting connected by visual and spatial relationships to the Atlantic horizon. The assessment treats these heritage assets as isolated, failing to recognise 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, changing the context in which heritage assets are perceived and severing their link to the natural horizon. This constitutes not only a visual impact but also a broader cultural and spatial harm that the application has not sufficiently assessed.

From a policy standpoint, the proposal contradicts National Planning Framework 4, which emphasises the need to protect natural places and historic assets. The extent of the proposed changes is at odds with the requirement to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further undermines any assertion of policy compliance.

It is evident that the impacts identified cannot be effectively mitigated. The scale, height, and proximity of the turbines would result in a dominant and unavoidable presence. Therefore, the resulting changes are fundamentally permanent and cannot 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 interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is significantly lacking and does not include the necessary details to adequately evaluate potential environmental impacts. There is a proposed undertaking of substantial seabed preparation and installation

work in a high-energy Atlantic environment; however, the application fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be established after consent has been granted, which hampers any meaningful assessment of their potential effectiveness.

This reliance on undefined future measures is particularly alarming given the sensitivity of the environment it affects. The West Lewis coastline features clean coastal waters and vital habitats that are susceptible to sediment disruption and pollution. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not supply adequate information on how these risks will be prevented, managed, or monitored.

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

The lack of comprehensive emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs any evaluation of whether suitable safeguards are in place to address pollution incidents. This not only introduces procedural risk but also undermines the ability of the competent authority to assess environmental protection measures at the time of determination.

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

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

FISHERIES AND MARINE LIFE

The proposal lacks a robust assessment of fisheries and marine life, failing to adequately evaluate the ecological and socio-economic impacts associated with the development. The waters off the West Lewis coast are home to both a diverse marine ecosystem and a functioning fishing industry; however, the application does not provide assurance that these habitats and uses will be protected or maintained without

significant disruption.

A critical flaw lies in the assumption that fishing activities can be displaced without repercussions. The application offers no evidence that alternative fishing grounds are available or capable of sustaining the additional pressure resulting from such displacement. This oversight is particularly concerning, as it poses a risk of overfishing in other areas and could have broader economic implications for the local fishing fleet. In the absence of a clear and evidence-based assessment, the potential impacts on fisheries and local livelihoods remain inadequately understood.

The proposal also poses substantial risks to marine species, primarily due to underwater noise generated during construction activities. The high-energy hammer piling anticipated over an extended period is likely to cause disturbance across considerable distances, thereby affecting species including dolphins. The expected disturbance to a significant portion of the local bottlenose dolphin population raises critical concerns, yet the application minimises these effects without sufficient supporting evidence.

Additionally, the application demonstrates a clear inconsistency by acknowledging 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 serious concerns about compliance with the Habitats Regulations, particularly where harm is anticipated to the extent requiring legal authorisation.

Moreover, the assessment does not take into account the cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents an incomplete assessment of the onshore infrastructure, failing to address the full extent of impacts associated with what constitutes a single integrated project. The offshore turbines and onshore works are inextricably linked, yet

they have been evaluated separately, leading to a fragmented analysis that obscures the true scale of both environmental and socio-economic effects.

Included among the onshore elements are the installation of 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, notably within Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The assessment does not comprehensively evaluate these impacts, thus hindering a complete understanding of the project's environmental footprint.

Furthermore, the application's exclusion or deferral of onshore impact assessments obstructs the proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates the consideration of all project components together, yet the delineation between offshore and onshore elements results in a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

There are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are afforded policy protection. The application fails to demonstrate that a thorough assessment of these habitats has been conducted or that suitable avoidance measures have been instituted, thus revealing a significant evidential gap concerning biodiversity protection.

Additionally, the routing of infrastructure through active croft land raises concerns about potential conflicts with existing land use and legal rights. The absence of evidence indicating that the requisite consents or processes have been initiated brings into question 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 is in conflict with both the National Marine Plan and National Planning Framework 4. The lack of evidence supporting the avoidance or mitigation of impacts further undermines the application.

In summary, the segmentation of project components, coupled with the absence of a thorough assessment and insufficient evidence regarding environmental and land use impacts, renders this portion of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of evaluation regarding nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. No assessment has been made concerning the impacts of artificial lighting on species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, all of which are highly sensitive to light. These species can experience disorientation due to phototaxis, leading to an increased risk of

collision. The application does not provide a lighting impact assessment or a phototaxis study, which means it fails to consider how the proposed aviation lighting could affect these species or potentially increase mortality rates.

Moreover, the assessment relies on daytime survey data, neglecting nocturnal activity and the associated risks. Species like Kittiwakes, which may forage or migrate at night, are similarly vulnerable to the effects of artificial lighting. This oversight creates a critical gap in understanding the ecological impacts that the proposal may have on local wildlife.

The introduction of permanent red aviation lighting is another significant concern. This lighting would be visible over long distances, creating an intrusive "wall of light" across the western horizon, which would fundamentally alter the night-time environment. The assessment does not address how this would impact visual amenity, landscape character, or the experience of residents and visitors, despite the importance of dark skies to the area's identity and its emerging tourism sectors, such as astro-tourism.

From a policy standpoint, these omissions conflict with National Planning Framework 4, which relates to the protection of natural places and environmental quality. The absence of an assessment of dark skies undermines the broader evaluation of landscape and seascape impacts, as the night-time character is an integral part of the environment.

Overall, the failure to assess the impacts on dark skies and nocturnal wildlife constitutes a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis leaves the application incomplete and unable to support a lawful determination. Without a thorough assessment, it is impossible to ascertain whether protected species or designated sites would be adversely affected, which engages the precautionary principle and necessitates a more cautious approach.

TOURISM

The proposal lacks a thorough assessment of tourism impacts, which is critical given its significance to the Isle of Lewis economy. Tourism relies heavily on the area’s wild coastline, nearly untouched landscapes, dark skies, and the overall sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure would influence visitor numbers, behaviours, or the economic contribution of the sector.

In recent years, tourism has experienced considerable growth, rising from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and accounting for as much as 16% of the island’s economy. Nevertheless, the application does not explore how the potential industrialisation of the seascape and degradation of environmental quality may affect Tourism Gross Value Added or the resilience of the local economy. Without such analysis, it is impossible to ascertain whether this development would yield a net economic benefit or pose a threat to an already

established and expanding sector.

Moreover, the assessment overlooks the significance of environmental quality in attracting tourists, specifically the role of unspoiled landscapes and dark skies in enhancing visitor experiences and catering to emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a substantial gap in understanding the implications for a recognised and growing component of the local economy.

Given that the island community has limited economic diversification, the neglect to assess tourism impacts extends beyond this sector, affecting employment, local businesses, and the sustainability of the community. The failure to conduct a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been evaluated in line with the requirements outlined in the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially regarding economic impact and the necessity to show a net benefit. It also contradicts strategic goals that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to appraise the economic ramifications of the proposal.

The collective failure to quantify tourism impacts, analyse the environmental factors influencing visitor behaviour, and address the island's economic reliance results in a significant evidential gap. This situation hampers a comprehensive evaluation of economic effects and reinforces the notion that the application is incomplete.

SUMMARY

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

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

Procedural failures are also apparent. The lack of a compliant Island Communities Impact Assessment represents a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment

constitutes a material omission. Such deficiencies obstruct the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

Uncertainties regarding environmental risks remain significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies in parts. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

This development will adversely affect sea life and poses a threat to birds. Disruption of the peat bogs during construction will release CO2 into the atmosphere, a contributing factor in global warming.
This windfarm is of no benefit to the inhabitants of the local area and will impact fishing and tourism which are vital to the local economy. The people do not want it and it will not benefit them. Turbines are not built here and the profits do not benefit the UK Foreign companies produce the turbines and reap the financial benefits.
Given the weather in this area, these turbines will spend significant time turned off and create a further strain on Scottish citizens who will have to subsidise them through their energy bills.
There are other, less distructive options for providing energy.
Turbines are not biodegradable and who will pay for the removal of these once they are

no longer viable?
The land will never be suitable for farming etc after it has been covered in concrete and the marine environment may never recover.
We have an environmentally important area which is under threat from companies and shareholders motivated by profit . Nature matters.
The more we destroy, the greater threat to our own survival in future.
This development is unnecessary and not wanted by those who will be impacted. Do they not matter?

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: B0DC4210

Member of the public 914

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area distinguished by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The scale and design of the proposal, along with its proximity to the shoreline, raise serious questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis to support a lawful determination. It is evident that critical environmental data is absent, baseline information is both limited and inconsistent, and several key aspects of the proposal remain undefined. Furthermore, the use of a flexible design framework obstructs a clear understanding of the likely significant effects of the development. The reliance on unspecified mitigation measures undermines the ability to assess their effectiveness. Consequently, the documentation fails to facilitate a full or informed understanding of the potential environmental, cultural, or community impacts, leading to unsupported claims of negligible or non-significant effects.

There are notable and significant conflicts with policy. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These inconsistencies directly relate to the statutory tests required for consent and compromise the competent authority's ability to conclude that the development is acceptable within a policy context.

The unprecedented scale of this proposal introduces large turbines in close proximity to the shoreline, which raises substantial concerns regarding landscape capacity, visual dominance, and environmental impact. Overall, the combination of inadequate information, reliance on undefined mitigation, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The inadequacy of the assessment concerning cultural heritage and community identity is alarming, as it does not acknowledge the West Lewis coastline as a vibrant cultural landscape. This area, where environment, language, tradition, and community are deeply interconnected, is treated reductively in the application, which views heritage merely as a collection of isolated, static assets instead of recognising their ongoing social, cultural, and spiritual significance within the community.

Significant shortcomings are evident in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These active burial sites, integral to spiritual practices, have been mischaracterised as static features, disregarding their current use, significance, and the effects of development on their surroundings. This oversight leads to an incomplete assessment of cultural impacts and neglects their vital role in community life.

The failure to consider intangible cultural heritage is another major concern. Elements such as the Gaelic language, traditions, and the enduring connection between the community and the coastal environment are crucial to the area's identity, yet they are wholly omitted from the assessment. Without acknowledging these aspects, it is impossible to gain a true understanding of the cultural impact of the proposed development.

Moreover, there are pressing issues regarding community rights and engagement. The Gaelic-speaking population, which embodies the characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. This lack of genuine engagement undermines the assessment's credibility and disregards established principles of participation in decisions affecting cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment represents a critical procedural failure. This assessment is a statutory requirement under the Islands (Scotland) Act 2018, and without it, the competent authority cannot meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents a lawful determination.

From a policy standpoint, these shortcomings place the proposal in stark opposition to National Planning Framework 4, especially regarding the protection of historic assets and places. Ignoring both tangible and intangible heritage, as well as failing to recognise living cultural practices, constitutes a clear violation of policy requirements.

Ultimately, the collective failure to assess living heritage, intangible cultural value, community rights, and necessary statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately examined, and the application falls short in providing a sufficient foundation for understanding the true cultural cost of the proposal.

FISHERIES AND MARINE LIFE

The assessment pertaining to fisheries and marine life is inadequate, failing to deliver a thorough evaluation of both ecological and socio-economic impacts. The waters surrounding the West Lewis coast are home to a varied marine ecosystem and a functioning fishing industry. However, the application does not convincingly demonstrate how these habitats and activities can be preserved or sustained without considerable disruption.

A key concern is the presumption that fishing operations can be relocated without adverse effects. The application lacks evidence to suggest that there are alternative fishing areas that are both available and suitable for accommodating additional fishing activity. This is a crucial oversight, as the displacement of fishing efforts could lead to overfishing in other regions and may have broader economic ramifications for the local fishing fleet. Without a robust, evidence-based assessment, the implications for fisheries and livelihoods remain unclear.

Additionally, the proposal poses significant risks to marine species, particularly due to the underwater noise produced during construction. The use of high-energy hammer piling for prolonged periods is expected to cause disturbances over considerable distances, impacting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population raises serious issues, yet the application minimizes these effects without adequate supporting evidence.

There is also a troubling inconsistency within the application, which acknowledges the necessity for licences to permit harm to European Protected Species, while simultaneously characterising the impacts as negligible. This contradiction diminishes the reliability of the assessment and raises questions about adherence to the Habitats Regulations, particularly in instances where anticipated harm necessitates legal authorisation.

Moreover, the assessment neglects to address cumulative impacts resulting from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. The absence of a thorough evaluation of these combined effects hampers the ability to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the deficiencies in the evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions contribute to an incomplete and unreliable assessment. These shortcomings hinder a comprehensive evaluation of the impacts on marine life and fisheries.

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 application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. It revisits the core issues that led to

the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This current proposal is presented under a supposedly stronger policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it falls short in these areas.

Crucial gaps exist in the baseline data provided, alongside the use of an undefined design envelope and unspecified mitigation measures. The omission of key impact pathways, particularly concerning nocturnal wildlife, full onshore infrastructure, and tourism, further undermines the application. The Environmental Impact Assessment is incomplete, failing to allow for a comprehensive understanding of significant effects or residual impacts.

Procedural shortcomings are evident in the absence of a compliant Island Communities Impact Assessment, breaching the statutory duty established under the Islands (Scotland) Act 2018. Furthermore, the lack of a full Social Impact Assessment represents a critical omission. These failings hinder the competent authority's ability to properly assess the implications for community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

In addition, the proposal is in direct conflict with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural areas, and cultural heritage. Furthermore, it fails to show that health and wellbeing impacts are acceptable, nor can it provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts from both offshore and onshore elements have not been adequately assessed, leaving concerns over effects on peatlands, carbon balance, habitats, and crofting land unaddressed.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also contain inconsistencies. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

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

Accordingly, a formal request is made for the refusal of the Spiorad na Mara Offshore Wind Farm application 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: 35351136

Member of the public 915

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

Dear Sir/Madam

This representation serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its supporting documentation reveals significant material deficiencies in planning, environmental consideration, cultural aspects, and procedural adherence. The project is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns arise regarding the scale, proximity, and design of the proposal, particularly regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application does not provide an adequate evidential basis for lawful determination, as critical environmental data is absent, baseline information is both limited and inconsistent, and essential elements of the proposal remain undefined. The flexible design framework used hinders a clear understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust evidence.

Substantial policy conflicts are evident. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment requirements, and National Planning Framework 4, especially concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These conflicts are directly related to the statutory tests necessary for consent and compromise the competent authority's ability to ascertain the development's acceptability within policy parameters.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally inadequate. It does not provide a reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is a highly sensitive and biologically active marine system, yet the baseline data is incomplete. The methodologies used fail to adequately capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

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

In addition, the assessment of basking sharks has notable deficiencies. The reliance on aerial surveys introduces significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that show frequent use of these waters. The failure to incorporate or adequately consider this data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

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

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

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions makes the assessment unreliable. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application lacks a sufficient evidential foundation.

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.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application fails to conduct a thorough assessment of the intangible cultural heritage that includes the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These elements are fundamental to the identity of the area and their exclusion from the assessment signifies a serious oversight. Without addressing these aspects, the true cultural impact of the proposed development remains obscured.

A significant shortcoming of the assessment is its inadequate treatment of key culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice, yet they are merely classified as static features in the evaluation. This oversight neglects their ongoing significance and the influence of the proposed development on their surroundings, leading to an incomplete understanding of cultural effects within the community.

Moreover, there are pressing concerns surrounding community rights and engagement. The Gaelic-speaking population, which embodies a distinct cultural identity associated with Indigenous Peoples, has not been afforded the process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and disregards established principles concerning participation in matters that affect cultural and environmental interests.

The assessment is also deficient in its failure to include a compliant Island Communities Impact Assessment, a requirement stipulated under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This oversight is critical as it hinders a lawful determination of the proposal.

From a policy standpoint, the deficiencies highlighted in the assessment place the proposal at odds with the National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The neglect to consider both tangible and intangible heritage, as well as the acknowledgment of living cultural practices, indicates a clear deviation from policy mandates.

In summary, the cumulative failures to assess living heritage, intangible cultural values, community rights, and statutory requirements culminate in a considerable evidential gap. The cultural impacts of the development have not been adequately explored, and the application ultimately lacks a robust foundation for assessing the true cultural cost of the proposal.

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. This application echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. It is presented now under a supposedly stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are substantial deficiencies in the evidential basis for this proposal. Critical gaps in baseline data exist, along with the use of an undefined design envelope. The reliance

on unspecified mitigation measures is troubling, and significant impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism effects, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects and residual impacts.

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

In addition, the proposal contradicts the National Planning Framework 4, failing to demonstrate the protection of biodiversity, natural places, and cultural heritage. It does not adequately show that health and wellbeing impacts are acceptable nor does it provide evidence of a net economic benefit, lacking tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been properly assessed, which obscures effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in certain areas. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the application of the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

When considering these points, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, preclude a lawful and evidence-based decision. The competent authority must refuse consent based on these grounds or invoke the relevant regulatory provisions to require the submission of the missing information.

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

Additional Comments

I have only recently heard about this massive windfarm proposal on the beautiful coastline of the Isle of Lewis and I am disgusted with the local council.

Why would anyone in their right mind think this was beneficial to anyone living on Lewis.
The size of these proposed structures will permanently destroy the beautiful unique landscape.
They will damage and cause injury and death to many seabirds in there path.
The coastline and sea in this area is home to a vast array of sea life, whales, dolphins, seals, etc.
I just can't understand the logic!
Destruction of your homeland of such scenic beauty for what?
I'm sure local residents will gain very little out of this multi billion
Pound proposed development which transfers all its income out of the area while residents pay the highest energy costs in the UK .
It's selling your soul to the devil.

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: D5E005C0

Member of the public 916

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 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 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 significantly inadequate, failing to offer a thorough or dependable understanding of the ecological receptors in the West Lewis coastal environment. This area is characterised by high sensitivity and biological activity, yet the baseline data remains incomplete, and the methodologies employed do not sufficiently capture the presence, behaviour, or habitat utilisation of various species. Consequently, the assessment lacks a robust evidential basis for evaluating potential impacts.

A notable shortcoming pertains to otters, a species afforded protection under European law. The application does not sufficiently acknowledge or assess their active use of coastal regions for foraging and movement. The oversight of their core foraging range

and behavioural patterns raises concerns, as it means that the implications of construction-related disturbances, noise, and increased human activity have not been adequately evaluated. This lack of consideration undermines any claims regarding the absence of significant effects on the otter population.

In addition, deficiencies are present in the assessment of basking sharks, which relies on aerial surveys that introduce a considerable detection bias, especially in Atlantic conditions. Such an approach is likely to underestimate their presence, especially in light of established land-based observations that indicate frequent use of these waters. The failure to integrate or adequately consider this data results in an incomplete baseline, further diminishing the reliability of the conclusions drawn.

The methodological flaws lead to conclusions of negligible or non-significant effects being derived from assumptions rather than solid evidence. The absence of comprehensive baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set forth in the Environmental Impact Assessment regime and the National Planning Framework 4, as protected species have not been adequately identified or assessed. The uncertainty introduced by these deficiencies obstructs the ability to rule out adverse effects with reasonable scientific certainty, thus necessitating the application of the precautionary principle. Under these circumstances, the grant of consent cannot be justified legally.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, containing significant gaps in evidence and inconsistencies that undermine its conclusions. This raises serious concerns, particularly given that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. The application fails to meet the necessary evidential standard to demonstrate that these species will not be adversely affected. It is located within key foraging areas and migratory pathways, yet the assessment does not adequately evaluate the risks associated with displacement, collision, or habitat loss.

Moreover, a critical contradiction is present within the application itself. The developer asserts that there will be no significant adverse effects, while also pursuing a Habitats Regulations derogation case, which is only applicable when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and

highlights that the conclusions drawn are not substantiated by the evidence provided. Insufficient evidence is presented regarding the impact on seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not fully recognised, and the reliance on modelling approaches injects uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. There is a strong likelihood that the methodologies employed underestimate mortality, especially given that baseline data is lacking and behavioural responses remain poorly understood.

The proposed siting of turbines within a known migratory corridor introduces an additional risk, creating a barrier in a primary flight path used by birds migrating between the United Kingdom and Iceland. The long-term consequences of sustained mortality in this corridor, as well as the potential effects on species with small global populations, are not adequately assessed in the application.

From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data deficiencies, and limitations in the modelling means that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and precludes a lawful conclusion in support of consent. The deficiencies identified also represent 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 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 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 cultural heritage and community identity is fundamentally flawed, particularly regarding the West Lewis coastline, which is a dynamic cultural landscape where environment, language, tradition, and community are deeply interconnected. This application adopts a simplistic view, treating heritage as isolated, static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

A major oversight is evident in the handling of significant cultural sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations are not merely static features; they serve as active places of burial and spiritual practice. The assessment's failure to account for their continued use and meaning, along with the potential impact of development on their setting, leads to an incomplete understanding of cultural effects and ignores their essential role in community life.

Furthermore, the evaluation neglects intangible aspects of cultural heritage such as the Gaelic language, traditions, and the enduring connection between the community and the coastal environment. These components are vital to the area's identity yet are entirely overlooked in the assessment, representing a significant gap. Without acknowledging these elements, the true cultural impact of the development remains unclear.

Community rights and engagement also raise serious concerns. The Gaelic-speaking population has a distinct cultural identity recognised as part of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement undermines the legitimacy of the assessment and does not adhere to established principles of participation regarding decisions that affect cultural and environmental interests.

A further procedural flaw is the absence of a compliant Island Communities Impact Assessment, required by the Islands (Scotland) Act 2018. This omission means the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. Such a gap alone renders a lawful determination impossible.

From a policy standpoint, these inadequacies place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with living cultural practices, clearly deviates from policy requirements.

Overall, the deficiencies in assessing living heritage, intangible cultural value, community rights, and statutory obligations culminate in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is a critical concern that undermines the entire evaluation process for this application. While the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This significant evidential gap hinders both public understanding and the competent authority’s ability to gauge the full scope of social risks identified through the developer’s own research.

Summaries available indicate that residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These documented impacts stem from direct engagement with the community and are therefore grounded in reality rather than speculation. The failure to release the complete assessment restricts proper scrutiny of these findings and obstructs the determination of their significance in the decision-making process.

There is also a perception among the community that the proposal poses a direct threat to their identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Despite this, the potential impacts have not been adequately incorporated into the main application or given the necessary consideration. The withholding of the full Social Impact Assessment conceals the genuine human and social costs associated with the development.

The implications of this lack of transparency extend to the Environmental Impact Assessment process as well. A comprehensive understanding of the social, economic, and health impacts is vital for developments of this magnitude, especially where community character and functioning are concerned. By failing to provide the complete dataset, the application lacks a thorough evidential foundation for weighing benefits against potential harm.

From a policy standpoint, the application does not satisfy the requirements outlined in National Planning Framework 4 regarding health and wellbeing. Developments should promote positive health outcomes and mitigate harm; however, the existing evidence suggests that adverse effects have not been fully disclosed. Without the full assessment, the application cannot demonstrate compliance with this policy.

The procedural ramifications are significant as well. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission in the application and a failure to satisfy the evidential standards demanded by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of seascape, landscape, and visual impacts is insufficient and does not adequately capture the extent of change or the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The proposed large-scale turbines would impose a continuous and overwhelming industrial presence near the shoreline, fundamentally changing this character and leading to a permanent and irreversible alteration of the landscape.

The application fails to represent the extent of this visual change properly. The size and closeness of the turbines mean that they would dominate views from residential areas, historic sites, and popular coastal locations. This would significantly affect visual amenity and diminish the important qualities of naturalness and remoteness. The assessment does not adequately convey the impact level or its significance within such

a sensitive landscape.

There are also issues with the methodology used for selecting and presenting visual viewpoints. Evidence indicates that the viewpoints may not fully capture the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact may have been underestimated, compromising the reliability of the assessment.

Another shortcoming is the lack of assessment of the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context, linked by visual and spatial relationships to the Atlantic horizon. The assessment regards these as separate entities instead of acknowledging their interdependence, leading to an incomplete analysis of the impacts on their settings and cultural importance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are perceived and interfering with their connection to the natural horizon. This represents not only a visual effect but also a wider cultural and spatial detriment that has not been adequately considered in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The magnitude 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 weakens any assertion of policy compliance.

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 dominant and unavoidable. The resulting change is, therefore, fundamental and permanent, not capable of being reduced 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 reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks the necessary detail to adequately assess construction and pollution risks, presenting significant concerns about potential environmental impacts. It entails extensive seabed preparation and installation within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application leans heavily on future mitigation and contingency measures that will be formulated post-consent, which hinders any meaningful evaluation of their potential effectiveness.

Given the sensitivity of the West Lewis coastline, which is home to clean coastal waters and essential habitats susceptible to sediment disturbance and contamination, this approach raises serious alarms. While the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate information on prevention, control, or monitoring strategies.

There is also a lack of clarity regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. The absence of robust modelling and well-defined management strategies makes it impossible to ascertain the potential extent, duration, or ecological consequences of these impacts. This uncertainty extends to the possible effects on marine species and habitats, which have already been identified as sensitive in the broader assessment.

Compounding these issues is the failure to include detailed emergency response procedures. By postponing the development of contingency plans to a later stage, the application obstructs the evaluation of whether suitable safeguards will be in place for pollution events. This situation introduces procedural risks and hampers the competent authority's ability to assess the environmental protection measures prior to the final decision.

From a regulatory standpoint, the postponement of vital environmental safeguards is at odds with the requirements stipulated by the Environmental Impact Assessment regime. It is essential to assess likely significant effects and mitigation before consent is granted. The absence of such critical information means a lawful determination cannot be achieved. Moreover, the application does not demonstrate compliance with existing policy requirements related to environmental protection and water quality.

In conclusion, the deficiencies in defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts render the assessment fundamentally inadequate. These shortcomings prevent a thorough evaluation of construction and pollution risks, further corroborating 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 proposed development lacks completeness, particularly regarding onshore infrastructure, which is crucial to understanding the impacts of this single integrated project. The offshore turbines and the onshore works are closely interconnected, yet they are treated as separate entities in the assessment process. This fragmented approach obscures the true scale of both environmental and socio-economic effects that arise from the project.

Onshore elements include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. This construction involves excavation in areas of deep peat, particularly within Barvas Moor, a significant carbon store and an

ecologically sensitive habitat. The lack of a comprehensive assessment regarding these impacts means the overall environmental footprint of the project cannot be fully understood.

By deferring or excluding 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 components of a project be considered together. The division of offshore and onshore elements results in a lack of understanding of the combined impacts on peatlands, habitats, and local communities.

Furthermore, there are considerable risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The proposal does not sufficiently demonstrate that the impacts on these habitats have been adequately assessed or that effective avoidance measures have been implemented. This indicates a significant gap in evidence concerning biodiversity protection.

Concerns also arise regarding the carbon balance associated with the proposal. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy initiatives. The application falls short in addressing this concern or in proving that the overall carbon balance remains positive.

The routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is a lack of evidence to confirm that necessary consents or processes have been initiated, which casts doubt on the project's deliverability and legality.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

More alarmingly, there has been no evaluation of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly sensitive to artificial lighting due to phototaxis, leading to disorientation and an increased risk of collision. The lack of a lighting impact assessment or phototaxis study means that the application does not account for how aviation lighting may adversely affect these species or contribute to increased mortality rates.

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

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

From a policy standpoint, this omission is at odds with National Planning Framework 4, which relates to the protection of natural places and environmental quality. It also undermines the broader evaluation of landscape and seascape impacts, as the character of night-time environments is integral to the overall ecosystem.

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

TOURISM

The evaluation of tourism impacts is significantly lacking and does not address the economic and social ramifications for a vital sector of the Isle of Lewis economy. The tourism industry relies heavily on the area's wild coastline, nearly pristine landscapes, dark skies, and its sense of remoteness. The application notes that 86% of visitors are attracted by the scenery; however, it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

Tourism has seen substantial growth, rising from £65 million in 2017 to more than £81.5 million, which supports over 1,000 jobs and constitutes up to 16% of the island's economy. Nevertheless, the application does not evaluate how the industrialisation of the seascape and a decline in environmental quality could affect Tourism Gross Value Added or the broader economic resilience. Without such analysis, it remains unclear whether the development would offer a net economic benefit or harm an established and expanding sector.

Moreover, the assessment neglects to consider the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a considerable gap in comprehending the impacts on a recognised and developing segment of the local economy.

In a community like the island, which has limited economic diversification, the neglect of tourism impact assessments has broader consequences 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 evaluated as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4, particularly regarding economic impact and the obligation to show net benefit. It also contradicts strategic objectives that designate tourism as a key growth sector and lacks sufficient evidence for the competent authority to evaluate the economic repercussions of the proposal.

In summary, the shortcomings in quantifying tourism impacts, analysing environmental factors influencing visitor behaviour, and acknowledging the island's economic dependence create a significant evidential gap. This hinders a comprehensive evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights a significant failure to meet the criteria for sustainable development when evaluated against legal obligations, national policies, and evidential requirements. This application mirrors the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Currently, it is put forth under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are substantial shortcomings in the evidential basis for determining the application. Essential baseline data is lacking, there is ongoing reliance on an ambiguous design envelope, unspecified mitigation measures are cited, and key impact pathways are excluded, including those relating to nocturnal wildlife,

comprehensive onshore infrastructure, and the tourism sector. As a result, the Environmental Impact Assessment remains incomplete and fails to provide a thorough understanding of the significant effects or residual impacts likely to arise.

Moreover, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory obligations under the Islands (Scotland) Act 2018, and the incomplete Social Impact Assessment is a critical omission. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal is also in direct opposition to National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage, fails to establish that health and wellbeing impacts are acceptable, and lacks evidence of net economic benefits due to insufficient tourism impact analysis. The cumulative effects of both offshore and onshore components have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and could be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The evidential standards needed to dismiss adverse effects beyond reasonable scientific doubt have not been satisfied, invoking the precautionary principle and preventing a lawful determination that impacts are acceptable.

Additionally, the proposal threatens to bring about significant and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual ties, and negative impacts on tourism represent lasting consequences that cannot be mitigated to an acceptable degree.

In conclusion, the application is fundamentally inadequate both procedurally and substantively for determination. The breadth of information deficiencies, along with policy discrepancies and unresolved environmental concerns, obstruct a lawful and evidence-based decision. The competent authority is urged to either reject the application on these grounds or utilise the appropriate regulatory measures to demand the missing information.

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

Additional Comments

I am not against renewable energy as a whole but to destroy the environment and delicate ecosystem is a travesty the size of these turbines is disturbing. The noice that the small ones make is bad but these will be on a whole other level as someone who

has health issues sleep being one of them is one of the reasons I moved from a big city to now have that tranquility stolen is disturbing and what does the future hold for the community and the younger generations . On top of that the islands will not benefit from these turbines no reduction on our energy costs and the tourism will die as who wants to come to a beautiful place to see the monster turbines there must be other alternatives to this and I ask you to reconsider the size and location of these turbines

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 21567A8E

Member of the public 917

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

Dear Sir/Madam

This letter formally objects to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The concerns regarding this proposal stem from its scale, proximity, and design, which raise fundamental issues about its alignment with statutory requirements, national policy, and sustainable development principles.

The application presents significant shortcomings, as it lacks an adequate evidential basis for lawful determination. There are critical gaps in environmental data, and the baseline information provided is limited and inconsistent. Moreover, key elements of the proposal remain undefined. The flexible design framework obscures a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures hinders any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not substantiated by robust evidence.

Substantive policy conflicts are evident, as the proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly relevant to biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not convincingly demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent, undermining the competent authority's ability to determine the development's acceptability in policy terms.

The scale of the proposed development is unprecedented for this location, with large turbines planned in close proximity to the shoreline. This introduces significant concerns related to landscape capacity, visual dominance, and overall environmental impact. When considering the absence of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle should be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species in the application is significantly flawed and does not provide a comprehensive understanding of the ecological receptors in the West Lewis coastal environment. This area is known for its

biological sensitivity and activity, yet the baseline data available is insufficient, and the methodologies employed fail to accurately capture essential details regarding species presence, behaviour, and habitat usage. Consequently, the assessment lacks a reliable evidential foundation for evaluating potential impacts.

A notable shortcoming is the inadequate recognition of otters, classified as a European Protected Species. The application does not effectively assess their active utilisation of coastal regions for foraging and movement. This oversight in considering their core foraging range and behavioural tendencies means that potential impacts from construction disturbances, noise, and increased human activity have not been properly evaluated, undermining claims regarding the lack of significant effects on this species.

Additionally, there are shortcomings in the evaluation of basking sharks, primarily due to reliance on aerial surveys, which are prone to significant detection bias under Atlantic conditions. This approach is likely to result in an underestimation of their presence, especially when compared to established land-based observations that indicate these waters are frequently used by the species. The failure to incorporate relevant data further contributes to an incomplete baseline and diminishes the credibility of the conclusions drawn.

These methodological deficiencies imply that assertions of negligible or non-significant effects are based on assumptions rather than substantiated evidence. The absence of adequate baseline data also hinders the ability to conduct meaningful assessments of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the criteria set forth by the Environmental Impact Assessment framework and the National Planning Framework 4, as it fails to properly identify and assess protected species. The uncertainty introduced by these deficiencies prevents the dismissal of potential adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsubstantiated conclusions renders the assessment untrustworthy. These shortcomings hinder a thorough evaluation of the impacts on marine ecology and protected species, reinforcing the overall conclusion that the application does not possess a solid evidential basis.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application revisits issues that led to the rejection of the Lewis Wind Power proposal in 2008, where unacceptable levels of industrialisation were identified. Despite being presented under a more robust policy framework that

emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not furnish a comprehensive or dependable evidential basis for evaluation.

Significant gaps exist in the baseline data, and the use of an undefined design envelope is concerning. Furthermore, the reliance on unspecified mitigation measures, as well as the omission of essential impact pathways including nocturnal wildlife, full onshore infrastructure, and tourism effects, renders the Environmental Impact Assessment incomplete. This lack of thoroughness inhibits a full understanding of the likely significant effects or residual impacts.

Procedural shortcomings are also evident. The failure to provide a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as per the Islands (Scotland) Act 2018, and the lack of a complete Social Impact Assessment is a material omission. Such deficiencies hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Additionally, the proposal is in direct conflict with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage, fails to show acceptable health and wellbeing impacts, and cannot substantiate a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been assessed properly, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty around environmental risks remains considerable. 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 satisfied, which invokes the precautionary principle and prevents a lawful conclusion regarding the acceptability of impacts.

The proposed development would lead to significant 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, would result in permanent effects that cannot be adequately mitigated.

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

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

Additional Comments

This is nothing to do with green energy its all about profits,never mind the harm they do.Why can't they leave marine animals alone.Its all about the money and profits.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 32B2B5B6

Member of the public 918

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 presents numerous deficiencies that render it unreliable and incomplete. It heavily relies on undefined mitigation measures, monitoring strategies, and management plans that have not yet been articulated. This approach seeks consent based on the premise that environmental harms will be managed in the future, thus obstructing any meaningful evaluation of the effectiveness of these measures or a proper assessment of residual impacts. Deferring critical information to the post-consent stage is procedurally unacceptable and contradicts the fundamental aims of the Environmental Impact Assessment regime, which mandates the clear establishment of significant effects and their mitigation before any determination is made.

Additionally, there are considerable gaps in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. Such shortcomings lead to uncertainty regarding the scale and significance of impacts, especially when claims of negligible or non-significant effects are not backed by robust data. The lack of sufficient information hampers a comprehensive understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainty incompatible with statutory obligations.

Moreover, this application does not meet the evidential threshold stipulated under the Habitats Regulations, as it fails to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not comply with National Planning Framework 4, as it does not demonstrate that impacts have been thoroughly assessed or that suitable safeguards are in place.

The reliance on a flexible Project Design Envelope, devoid of specific turbine dimensions, layouts, or configurations, fosters significant uncertainty that hinders a consistent application of a worst-case scenario. Such a lack of commitment undermines the integrity of the assessment, meaning that the impacts presented may not truly represent the development ultimately constructed. Consequently, the competent authority and the public are left without a clear understanding of the actual environmental effects, which further complicates the decision-making process.

ASSESSMENT OF ALTERNATIVES

The proposed development's assessment of alternatives is grossly inadequate and fails to satisfy the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a coherent and reasoned evaluation of viable alternatives based on their environmental consequences, the application merely recounts the project's evolution. This narrative approach does not prove that less harmful options have been thoroughly identified, evaluated, and chosen over more damaging alternatives.

There is a significant lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has genuinely considered placing turbines further offshore, where the potential visual, ecological, and coastal impacts

would likely be lessened. Given the sensitivity of the West Lewis coastline, as well as the critical importance of proximity to the shore in assessing impact, the absence of such an analysis hinders any conclusion regarding the proposed siting as the least damaging option.

These shortcomings also extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to prevent or lessen impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The lack of a definitive avoidance strategy and a comparative analysis suggests that mitigation by design has not been employed, with reliance instead on measures that would be enacted after the design stage.

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

From a policy standpoint, this inadequacy undermines adherence to National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant oversight that contributes to the overall conclusion that the application has not been properly evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species presents significant deficiencies that compromise the understanding of ecological receptors within the West Lewis coastal environment. This area is notably sensitive and biologically active; however, the baseline data provided is incomplete, and the methodologies utilised fail to capture the presence, behaviour, and habitat use of various species. Consequently, the evidential basis for evaluating potential impacts is inadequate.

Specifically, there is a critical oversight regarding otters, a species protected under European law, as the application does not adequately recognise or assess their active foraging and movement in coastal areas. The assessment neglects to consider their core foraging range and behavioural patterns, thereby failing to properly evaluate the potential effects of disturbances caused by construction, noise, and increased activity. This oversight undermines any conclusions drawn about the absence of significant effects on otters.

Further shortcomings exist in the assessment of basking sharks, where the reliance on aerial surveys introduces significant detection bias, particularly under Atlantic conditions. This method is likely to lead to an underestimation of the species' presence,

especially when contrasted with established land-based observations indicating their frequent use of these waters. The failure to incorporate or adequately consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings mean that assertions of negligible or non-significant effects are based more on assumptions than on sound evidence. The lack of sufficient baseline data obstructs a meaningful assessment of cumulative and indirect impacts, including those arising from seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not conform to the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to properly identify and assess protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, it is not lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to demonstrate that internationally important seabird populations will not be adversely affected, particularly in light of the west coast of the Isle of Lewis supporting many species already in decline. The assessment is materially flawed, presenting significant gaps in evidence and internal inconsistencies that undermine its conclusions. It does not adequately evaluate the implications of displacement, collision risk, or habitat loss, particularly within key foraging areas and migratory pathways.

A key contradiction exists, as the developer claims no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious concerns regarding the reliability of the assessment and suggests that the conclusions presented lack support from the underlying evidence. The application neglects to provide sufficient evidence that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected, failing to fully account for the importance of these feeding grounds. Additionally, the reliance on modelling approaches introduces uncertainty, particularly for species experiencing severe declines, like Kittiwakes and Fulmars, and is likely to underestimate mortality rates, especially where baseline data is lacking and behavioural responses are poorly understood.

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

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been reached. This situation engages the precautionary principle and precludes a lawful conclusion in support of consent. Moreover, the identified deficiencies indicate a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed, as it does not recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are intricately linked. Instead of acknowledging the ongoing social, cultural, and spiritual significance of heritage, the application reduces it to a collection of isolated, static assets.

There is a notable inadequacy in how culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas, are evaluated. These sites serve as active places of burial and spiritual practice, yet they are mischaracterised as static features. This oversight fails to consider their current use, meaning, and the impact of development on their environment. Consequently, this leads to an incomplete assessment of cultural effects and neglects the essential role these sites play in community life.

Moreover, the evaluation does not encompass intangible cultural heritage, which includes the Gaelic language, local traditions, and the longstanding relationship between the community and the coastal environment. These elements are crucial to the area's identity but have been wholly overlooked in the assessment, representing a serious omission. Without the inclusion of these factors, the cultural impact of the proposed development cannot be accurately understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity that aligns with characteristics of an Indigenous People, yet the application has not undertaken a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of

the assessment and fails to align with established principles of participation in decisions that affect cultural and environmental interests.

A significant procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The failure to carry out this assessment prevents the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone is sufficient to render a lawful determination impossible.

From a policy standpoint, these shortcomings put the proposal in direct conflict with National Planning Framework 4, particularly concerning the preservation of historic assets and places. The neglect to consider both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, clearly deviates from policy expectations.

In summary, the combined failures to assess living heritage, intangible cultural value, community rights, and legal obligations create a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to offer a solid basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposed development is fundamentally lacking in transparency and completeness, which are essential for a lawful evaluation. Although the developer engaged in a Social Impact Assessment and conducted focus groups with local residents, the absence of the full report creates a significant evidential gap. This lack of information restricts both public understanding and the competent authority's ability to gauge the full spectrum of social risks highlighted by the developer's own research.

Available summaries suggest that local residents are already facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These reported impacts stem from direct community engagement and are not based on speculation. Nevertheless, the failure to release the complete assessment undermines thorough scrutiny of the findings and constrains the evaluation of their implications within the decision-making process.

Furthermore, there is notable evidence suggesting that the proposal poses a direct threat to community identity and cohesion, with references to "cultural loss" featured in the developer's own findings. Despite this recognition, these critical impacts have not been adequately incorporated into the primary application or afforded the necessary weight. The withholding of the complete Social Impact Assessment thus obscures the genuine human and social costs of the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and

health impacts is vital for developments of this magnitude, particularly when community character and functionality may be at stake. The failure to provide the full dataset means that the application does not present an adequate evidential basis for weighing the benefits against the potential harms.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 concerning health and wellbeing. Development proposals are required to foster positive health outcomes and mitigate harm, yet existing evidence suggests adverse effects that have not been thoroughly disclosed. Without access to the full assessment, it is impossible to confirm compliance with this policy.

The procedural ramifications are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation due to the absence of the complete Social Impact Assessment. This omission represents a significant flaw within the application and constitutes a failure to satisfy the evidential requirements mandated by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, along with existing evidence of adverse impacts, renders the assessment both incomplete and unreliable. This situation obstructs a lawful determination and further emphasises that the application is inadequately supported by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts associated with the proposed turbines is significantly lacking and does not adequately capture 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 pronounced sense of remoteness. Introducing large-scale turbines near the shore would create a continuous industrial presence that would fundamentally alter this character and lead to a permanent transformation of the landscape.

Moreover, the application fails to represent the true magnitude of the visual changes. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, thus directly impacting visual amenity and undermining the naturalness and sense of remoteness that define the area. The assessment does not sufficiently communicate this level of impact or its significance within such a sensitive landscape context.

Concerns also arise regarding the methodology used to select and present visual viewpoints. Evidence indicates that these viewpoints may not accurately depict the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the visual impact has been understated, compromising the reliability of the assessment.

Additionally, there is a failure to assess the interconnected relationship between

landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context linked to the Atlantic horizon through visual and spatial relationships. The assessment treats these sites as isolated entities rather than acknowledging their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural importance.

The proposed industrialisation of the seascape would disrupt these relationships, changing the context in which 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 detriment that has not been adequately assessed.

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the preservation of natural spaces and historic assets. The proposed changes are incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertion of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works within a high-energy Atlantic environment, raising substantial concerns about the assessment of construction and pollution risks. Currently, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on unspecified mitigation and contingency measures to be developed after consent, which hinders any meaningful evaluation of their effectiveness or adequacy.

This reliance on undefined future measures is particularly alarming considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges potential risks such as sediment mobilisation and accidental chemical or oil spills, it lacks adequate detail on how these issues will be prevented, controlled, or monitored.

There is also significant uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without

thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty encompasses potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

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

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Likely significant effects and necessary mitigation must be evaluated prior to consent, and without this information, a lawful determination cannot be achieved. Moreover, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

Collectively, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts render the assessment materially deficient. These issues prevent a thorough evaluation of construction and pollution risks and reinforce the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application under review fails to adequately protect or maintain these critical habitats and uses, leading to significant concerns regarding ecological and socio-economic impacts. The assessment of fisheries and marine life is lacking, particularly in its evaluation of fishing displacement, which is presumed to occur without consequence. There is no evidence presented that alternative fishing grounds are accessible or can sustain additional pressure, a significant oversight that raises the risk of overfishing and potential economic fallout for the local fleet.

Moreover, the proposal poses considerable risks to marine species, especially due to underwater noise from construction activities. The high-energy hammer piling anticipated over an extended duration is likely to disturb marine life across vast distances, impacting species such as dolphins. Concerns have been raised about the predicted disturbance affecting a substantial part of the local bottlenose dolphin population, yet the application downplays the significance of these effects without adequate supporting evidence.

The application also reveals contradictions, acknowledging the necessity for licences for any harm to European Protected Species while simultaneously characterising the

impacts as negligible. This inconsistency undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, particularly where potential harm is identified that may warrant legal authorisation.

Cumulative impacts resulting from habitat disturbance, noise, and the displacement of fishing activities have not been sufficiently evaluated. The lack of a comprehensive assessment of these combined effects leaves the overall implications for marine ecosystems and socio-economic conditions unclear.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to illustrate how the development can coexist with existing marine users or avoid unacceptable consequences for marine biodiversity, precluding any assertion that the proposal constitutes sustainable development.

In summary, the deficiencies in evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies compromise the reliability of the assessment, thereby obstructing a thorough evaluation of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves significant onshore infrastructure works, including cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. These elements are assessed separately from the offshore turbines, which leads to a fragmented evaluation and obscures the true scale of the project's environmental and socio-economic impacts. The excavation across deep peat areas, particularly within Barvas Moor, threatens a critical carbon store and ecologically sensitive habitat. The application fails to provide a comprehensive assessment of these impacts, which inhibits a complete understanding of the project's overall environmental footprint.

By neglecting to adequately assess the onshore impacts, the application does not allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered together. However, the separation of onshore and offshore elements leaves the combined impacts on peatlands, habitats, and local communities inadequately understood.

Moreover, there are considerable risks to sensitive habitats such as machair systems and peatland environments, which enjoy policy protection. The application does not demonstrate that the impacts on these habitats have been thoroughly assessed or that effective avoidance measures have been taken. This results in a clear evidential gap regarding biodiversity protection.

The proposal raises critical concerns about carbon balance. Disturbing peatland can release stored carbon, potentially generating a carbon debt that undermines the goals of renewable energy development. The application does not sufficiently address this

matter or show that the overall carbon balance remains beneficial.

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

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

In summary, the separation of project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts render this application incomplete and unreliable, ultimately obstructing 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 significant oversight. The West Lewis coastline is renowned for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposed introduction of permanent red aviation lighting, visible from long distances, would create a continuous and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the importance of dark skies to the region's identity and to emerging sectors such as astro-tourism. The lack of consideration for these impacts creates a clear deficiency in the overall landscape and environmental evaluation.

Furthermore, there is no analysis of the implications for nocturnal wildlife. Certain species, including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, are particularly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and increased risks of collision. The absence of any lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species or its contribution to mortality rates have not been addressed.

This gap is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity and the associated risks. Species such as Kittiwakes, which may forage or migrate during the night, are also susceptible to disorientation caused by artificial lighting, yet this risk remains unassessed. The lack of site-specific night-time data creates a critical void in understanding ecological impacts.

Without an assessment of nocturnal effects, it is impossible to determine whether protected species or designated sites could be adversely impacted. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, necessitating the application of the precautionary principle and precluding a lawful determination.

From a policy standpoint, these omissions are at odds with National Planning Framework 4 regarding the protection of natural areas and environmental quality. They further undermine the comprehensive evaluation of landscape and seascape impacts, as the character of the night-time environment is an essential component of the overall setting.

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

TOURISM

The inadequacy of the tourism impact assessment is striking, as it neglects to analyse the economic and social repercussions for a vital sector of the Isle of Lewis economy. The growth of tourism has been remarkable, increasing from £65 million in 2017 to over £81.5 million, and this sector supports more than 1,000 jobs, making up to 16% of the island's economy. Despite its significance, the application fails to model how the proposed industrialisation of the seascape and degradation of environmental quality would affect Tourism Gross Value Added or the overall resilience of the economy. This oversight raises questions about whether the development would actually provide a net economic benefit or jeopardise a thriving sector.

Furthermore, the application does not adequately address the crucial role that environmental quality plays in attracting visitors. The wild coastline, pristine landscapes, and dark skies are fundamental to the tourist experience, yet the assessment omits a Dark Skies Assessment, leaving a substantial void in understanding the potential impact on growing markets such as nature-based tourism and astro-tourism. This lack of consideration hampers the ability to evaluate how large-scale offshore infrastructure could change visitor behaviour, numbers, and economic contributions.

The deficiencies in assessing tourism impacts have broader implications for employment, local businesses, and community sustainability in an island community that lacks economic diversification. The failure to carry out a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been examined, which is necessary as stipulated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4, particularly regarding economic impact and the

requirement to prove net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector and falls short of providing sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. It mirrors the central issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application does not provide a comprehensive or dependable evidential foundation for determination.

There are critical deficiencies in baseline data, a reliance on an undefined design envelope, and unspecified mitigation measures. Key impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism effects, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of likely significant effects or residual impacts.

The procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment contravenes statutory duties under the Islands (Scotland) Act 2018, and the failure to disclose the full Social Impact Assessment represents a significant omission. These failures obstruct the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

Uncertainties regarding environmental risks persist and may be significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent internally. 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 regarding

acceptable impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The extent of informational deficiencies, coupled with policy contradictions and unresolved environmental risks, precludes a lawful and evidence-based decision. Therefore, it is imperative that the competent authority either refuse consent on these grounds or invoke the necessary regulatory provisions to request the submission of the missing information.

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

Additional Comments

How can you not see the devastating affect these will have on all aspects of wildlife, human life, livelihood's.
It will be yet another case of in 20 years time, “ lessons will be learned from this mistake”!
Too much, too little& to o late.
Why not spend the money on the many issues these islands and the country have that need “ fixing” before going on to make more “ mistakes” costing more billions in money and in lives themselves.
Stop filling the pockets of the super rich and think about humanity.

,

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: 5F3D05F9

Member of the public 919

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The proposal is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. Concerns about the scale, proximity, and design of the development raise questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The documentation provided fails to supply a sufficient evidential foundation for a lawful assessment. There are significant gaps in critical environmental data, with baseline information being both limited and inconsistent. Additionally, important aspects of the proposal remain undefined. The flexible design framework utilised does not facilitate a clear understanding of potential significant effects, and reliance on unspecified mitigation measures means their effectiveness remains unassessed. Consequently, there is no comprehensive understanding of the environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to a lack of robust evidence.

There are notable and serious conflicts with established policy. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national obligations to protect biodiversity, climate interests, and overall environmental integrity. These issues challenge the statutory tests required for consent and compromise the capacity of the competent authority to deem the development acceptable in policy terms.

The unprecedented scale of this proposal in the area, with substantial turbines situated near the shoreline, raises significant worries about landscape capacity, visual impact, and broader environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy violations indicates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate, failing to deliver a complete, transparent, or trustworthy overview of the likely environmental repercussions of the proposal. The flexible Project Design Envelope, which lacks

specific turbine dimensions, layouts, or configurations, creates substantial uncertainty and hinders the application of a worst-case scenario. This compromises the assessment's integrity, meaning the impacts outlined may not accurately represent the development that is ultimately built. Consequently, both the public and the competent authority are deprived of a true understanding of the extent of environmental effects.

Furthermore, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have yet to be clearly defined. Seeking consent on the premise that environmental harm will be mitigated later obstructs a meaningful evaluation of effectiveness or assessment of residual impacts. Such deferral of critical information to post-consent stages is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's purpose, which necessitates that likely significant effects and mitigation measures be established before determination.

There are substantial evidential deficiencies present, including insufficient baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, particularly where conclusions of negligible or non-significant effects are reached without strong supporting data. The lack of adequate information inhibits a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal additionally falls short of demonstrating compliance with National Planning Framework 4, including its stipulations regarding biodiversity protection and environmental integrity, as it cannot be verified that impacts have been comprehensively assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, absence of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and thorough assessment of environmental effects and indicate that the competent authority cannot properly determine the application based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

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

A significant oversight in the application pertains to otters, which are a European Protected Species. The failure to properly recognise and assess their active use of coastal areas for foraging and movement is troubling. Without considering their core foraging range and behavioural patterns, the potential effects of construction disturbance, noise, and increased activity have not been adequately evaluated. This lack of assessment undermines any conclusions regarding the absence of significant effects on otters.

Further shortcomings are evident in the assessment of basking sharks, where reliance on aerial surveys has led to significant detection bias, particularly in Atlantic conditions. This method is likely to underestimate their presence, especially when contrasted with established land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider such important data results in an incomplete baseline, thereby weakening the reliability of the conclusions drawn.

These methodological deficiencies mean that any conclusions regarding negligible or non-significant effects rely on assumptions rather than solid evidence. The inadequacy of baseline data also hinders meaningful assessment of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual scale of risk to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development on the west coast of the Isle of Lewis is critically flawed, exhibiting substantial gaps in evidence and internal contradictions that undermine its findings. This area is home to internationally significant seabird populations, many of which are already in decline. However, the application fails to adequately demonstrate that these species will not be negatively impacted. The development is situated within key foraging areas and migratory routes, yet the assessment does not thoroughly consider the risks of displacement, collision, or habitat loss.

A major inconsistency arises within the application, as the developer claims there will

be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is typically necessary only when significant harm is anticipated. This contradiction raises serious doubts about the credibility of the assessment and suggests that its conclusions lack support from the underlying evidence.

Furthermore, the assessment does not sufficiently establish that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The critical importance of these feeding grounds is insufficiently addressed, and reliance on modelling approaches introduces uncertainty, particularly concerning species like Kittiwakes and Fulmars that are in severe decline. The methodologies used are likely to underestimate mortality rates, particularly due to incomplete baseline data and an inadequate understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional and significant risk by effectively obstructing a primary flight path for species migrating between the United Kingdom and Iceland. The application lacks a thorough assessment of the long-term consequences of sustained mortality in this corridor and its potential impacts on species with relatively small global populations.

Regulatory scrutiny reveals that the application does not satisfy the evidential requirements necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, along with gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle, thereby obstructing a lawful conclusion in favour of consent.

Overall, the identified deficiencies reflect a failure to adhere to National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to prove that internationally important seabird populations will not face adverse effects places the proposal in direct opposition to national policy. Collectively, these factors render the assessment unreliable, characterised by internal inconsistencies, methodological flaws, and a lack of sufficient evidence. Such shortcomings inhibit a thorough evaluation of impacts and lead to the conclusion that the application fails to meet the statutory requirements needed for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is lacking and does not recognise the West Lewis coastline as an active cultural landscape where environment, language, tradition, and community are intertwined. Instead, the application simplifies heritage, viewing it as a collection of isolated, unchanging assets without acknowledging their ongoing social, cultural, and spiritual roles within the community.

Particularly concerning is the way culturally important sites, like the cemeteries at Dalmore, Bragar, and Barvas, are addressed. These sites serve as active places for

burial and spiritual practice, yet the assessment reduces them to static elements, neglecting their continued significance and the potential effects of development on their surroundings. This mischaracterisation leads to a partial understanding of cultural impacts and overlooks their importance in community life.

Moreover, the assessment does not take into account intangible cultural heritage such as the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These factors are essential to the area's identity but are missing from the assessment, which is a major oversight. Failing to consider these elements means that the cultural effects of the development cannot be accurately assessed.

There are additional issues surrounding community rights and engagement. The Gaelic-speaking community possesses a unique cultural identity recognised as that of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement undermines the assessment's validity and does not align with established principles of participation concerning cultural and environmental interests.

A significant procedural gap exists due to the absence of a proper Island Communities Impact Assessment, which is legally required under the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot meet its legal obligations to assess the social, cultural, and economic effects on the island community. This omission alone renders the determination unlawful.

From a policy standpoint, these inadequacies put the proposal at odds with National Planning Framework 4, particularly regarding the protection of historical assets and locations. The neglect of both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, clearly violates policy standards.

In summary, the lack of consideration for living heritage, intangible cultural value, community rights, and legal requirements creates a significant gap in the evidence. The cultural impacts of the development have not been properly evaluated, and the application lacks the necessary foundation for assessing the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development suffers from a significant lack of transparency concerning its social impacts, health, and wellbeing assessments. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the complete report remains unpublished. This omission results in a substantial evidential gap, hindering both the public and the competent authority from fully understanding the social risks identified in 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

have been gathered through direct engagement, therefore are not speculative in nature. However, the failure to disclose the full assessment restricts proper scrutiny of its findings and limits the capacity to gauge their significance in the decision-making process.

Evidence indicates that the proposal is seen as a direct threat to community identity and cohesion, with the developer's own findings highlighting "cultural loss." Despite this, such impacts have not been adequately integrated into the main application nor given appropriate consideration. By withholding the complete Social Impact Assessment, the true human and social costs of the development remain obscured.

This lack of transparency directly undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. The absence of the complete dataset means the application does not provide a comprehensive evidential basis for evaluating the balance between benefits and harms.

From a policy standpoint, the application fails to prove compliance with National Planning Framework 4 regarding health and wellbeing. Development should foster positive health outcomes and mitigate harm, yet existing evidence points to adverse effects that have not been fully disclosed. Without the full assessment, compliance with this policy cannot be demonstrated.

The procedural implications are notable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a significant 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 negative impacts, renders the assessment incomplete and unreliable. This situation prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts related to the proposed development is fundamentally inadequate and does not reflect the true scale of change or the sensitivity of the surrounding environment. The West Lewis coastline is marked by its open Atlantic horizon and an undeveloped character that conveys a strong sense of remoteness. The close proximity of large-scale turbines to the shoreline would introduce a continuous industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

This application fails to capture the extent of the visual change that would occur. The size and location of the turbines would dominate views from residential areas, historic

sites, and well-frequented coastal locations, adversely affecting visual amenity and undermining the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of these impacts within such a sensitive landscape.

Moreover, there are methodological issues concerning the selection and depiction of visual viewpoints. Evidence indicates that the viewpoints chosen may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and areas of high landscape value. Consequently, this raises the possibility that the visual impact has been underestimated, compromising the reliability of the assessment.

Another critical shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape context, linked visually and spatially to the Atlantic horizon. Treating these as isolated features neglects their interdependence and leads to an incomplete evaluation of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these connections, changing how heritage assets are perceived and their relation to the natural horizon. This change signifies not only a visual impact but also a broader cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the protection of natural areas and historic assets. The degree of change is at odds with the requirement to maintain landscape character, visual amenity, and the setting of culturally important 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 overwhelmingly dominant and unavoidable. Therefore, the resulting change is profound and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

Overall, the assessment fails to accurately depict the magnitude of impact, the sensitivity of the environment, and the interconnected nature of the landscape and heritage. These inadequacies prevent a trustworthy 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 significantly lacking and does not include the necessary details to adequately evaluate potential environmental impacts. There is a proposed undertaking of substantial seabed preparation and installation work in a high-energy Atlantic environment; however, the application fails to provide

fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be established after consent has been granted, which hampers any meaningful assessment of their potential effectiveness.

This reliance on undefined future measures is particularly alarming given the sensitivity of the environment it affects. The West Lewis coastline features clean coastal waters and vital habitats that are susceptible to sediment disruption and pollution. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not supply adequate information on how these risks will be prevented, managed, or monitored.

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

The lack of comprehensive emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs any evaluation of whether suitable safeguards are in place to address pollution incidents. This not only introduces procedural risk but also undermines the ability of the competent authority to assess environmental protection measures at the time of determination.

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

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

FISHERIES AND MARINE LIFE

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

A major concern is the assumption that fishing activities can be shifted without

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

Moreover, the project poses considerable threats to marine species, especially due to the underwater noise produced during construction. The use of high-energy hammer piling over prolonged periods is anticipated to disturb marine life across extensive areas, particularly affecting dolphins. The expected disruption to a significant portion of the local bottlenose dolphin population raises substantial worries, yet the application minimises these effects without adequate evidence.

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed development involves offshore turbines alongside significant onshore infrastructure, including cabling and a substation near Stornoway. However, the assessment of these onshore components is materially incomplete, failing to acknowledge the interconnected nature of the project. This fragmented approach obscures the overall scale of the environmental and socio-economic impacts that arise from the project.

Among the onshore elements is the cabling which crosses protected moorland, alongside access infrastructure that traverses sensitive landscapes. Excavation

activities will take place in areas of deep peat, particularly within Barvas Moor, a vital carbon store and ecologically sensitive habitat. The application does not provide a thorough assessment of these impacts, which hinders a full understanding of the project's overall environmental footprint.

The failure to evaluate onshore impacts prevents a proper assessment of cumulative effects, which is essential according to the Environmental Impact Assessment process. By treating the offshore and onshore components separately, the application fails to fully account for their combined impacts on peatlands, habitats, and local communities.

Sensitive habitats, including machair systems and peatland environments that are under policy protection, face significant risks from the proposed project. The application does not adequately demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, resulting in a clear evidential gap concerning biodiversity protection.

Moreover, the proposal raises concerns about carbon balance, as the disturbance of peatland could lead to the release of stored carbon, creating a carbon debt that contradicts the objectives of renewable energy development. This critical issue is not addressed adequately in the application, leaving uncertainty about whether the overall carbon balance remains beneficial.

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

From a policy perspective, the lack of a holistic assessment of the project, alongside failure to protect peatlands, habitats, and land use interests, conflicts with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further undermines the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly concerning given the importance of dark skies to the identity of the area and its potential to support emerging sectors such as astro-tourism. The lack of consideration for these impacts results in a clear gap in the overall assessment of the landscape and environmental factors.

Moreover, there is no evaluation of the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can cause disorientation and increase collision risks. The application does not include a lighting impact assessment or a study of phototaxis, failing to address how aviation lighting may affect these species or potentially increase mortality rates.

This issue is exacerbated by the dependence on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and the associated risks. Kittiwakes, for instance, may forage or migrate at night and are susceptible to disorientation due to artificial lighting. However, this risk has not been assessed. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts.

Without an assessment of nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites could be adversely impacted. The evidential standard required to demonstrate the absence of adverse effects beyond reasonable scientific doubt cannot be achieved, necessitating the application of the precautionary principle and precluding a lawful determination.

From a policy standpoint, this omission contradicts the guidelines established in National Planning Framework 4 regarding the protection of natural places and environmental quality. Furthermore, it undermines the comprehensive evaluation of landscape and seascape impacts, as the character of night-time conditions is a vital aspect 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 results in an incomplete application that cannot support a lawful determination.

TOURISM

The tourism sector on the Isle of Lewis, which has grown from £65 million in 2017 to over £81.5 million and supports more than 1,000 jobs, accounts for up to 16% of the island's economy. Despite this substantial contribution, the application fails to model the economic impacts of large-scale offshore infrastructure on tourism. It acknowledges that 86% of visitors are attracted by the area's scenery, yet there is no quantified assessment regarding how this development may alter visitor numbers,

behaviour, or overall economic contribution.

Additionally, the assessment neglects the critical relationship between environmental quality and tourism, including the significance of unspoiled landscapes and dark skies for visitor experience. This oversight is particularly troubling given the growing interest in nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment represents a notable deficiency, resulting in a lack of understanding of potential impacts on this emerging sector of the local economy.

In an island community with limited economic diversity, the failure to evaluate tourism impacts extends beyond mere economic figures, affecting 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 thoroughly analysed 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 need to show a net benefit. It also conflicts with strategic objectives that regard tourism as a priority growth sector. The evidence provided is insufficient for the competent authority to adequately assess the economic consequences of the proposal.

Overall, the combined deficiencies in quantifying tourism impacts, evaluating the environmental drivers of visitor behaviour, and acknowledging the economic reliance on tourism create a significant evidential gap. This undermines the ability to conduct a thorough assessment of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory obligations, national policies, and evidential standards. This application mirrors the central issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. Now, this new application is presented under a framework that more strongly emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Significant gaps exist in the evidential basis for determining this application. There are deficiencies in baseline data, an undefined design envelope is employed, and unspecified mitigation measures are relied upon. Key impact pathways concerning nocturnal wildlife, complete onshore infrastructure, and tourism effects have not been addressed. Consequently, the Environmental Impact Assessment is inadequate and fails to provide a clear understanding of the likely significant effects or residual impacts.

Moreover, there are notable procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands

(Scotland) Act 2018. Additionally, the failure to disclose a comprehensive Social Impact Assessment represents a material omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

This proposal stands in direct contradiction to National Planning Framework 4. It does not demonstrate protection for biodiversity, natural areas, and cultural heritage. Furthermore, it fails to show that impacts on health and wellbeing are acceptable and cannot provide evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impact of both offshore and onshore elements has not been thoroughly assessed, leading to obscured effects 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 occasionally inconsistent. The necessary evidential threshold to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and obstructing a lawful conclusion regarding acceptable impacts.

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 impacts on tourism will result in permanent effects that cannot be adequately mitigated.

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

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

Additional Comments

Disgusting destruction of quality of life and devastating to wildlife and marine life.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: F400562D

Member of the public 920

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from an examination of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural integrity. The development is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, relatively untouched environment, and strong cultural heritage. The proposal's scale, proximity to the shore, and design prompt serious concerns regarding its alignment with statutory obligations, national policy, and sustainable development principles.

The application lacks an adequate evidential foundation for a lawful decision. There is a notable absence of critical environmental data, limited and inconsistent baseline information, and several key elements of the proposal remain unclear. The proposal's flexible design framework hinders a thorough understanding of potential significant effects, while the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the existing documentation does not facilitate a comprehensive or informed appraisal of the environmental, cultural, or community impacts, nor do the assertions of negligible or non-significant effects rest on solid evidence.

Substantial conflicts with policy are evident. The proposal seems to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It does not adequately show that national standards for protecting biodiversity, climate considerations, and environmental integrity can be achieved. These discrepancies undermine the statutory tests essential for consent and compromise the ability of the competent authority to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal at this site, with large turbines planned near the shoreline, raises significant issues regarding landscape capacity, visual dominance, and environmental consequences. Collectively, the lack of sufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and unable to support a lawful determination. In light of these factors, it is necessary to apply the precautionary principle.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a comprehensive and transparent account of the potential environmental effects associated with the proposal. A flexible Project Design Envelope has been employed, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hampers the ability to apply a worst-case scenario consistently. As a result, the integrity of the assessment is compromised, and the impacts presented may not accurately reflect the development that will ultimately be constructed. This situation prevents both the public and the competent authority from grasping the true extent of the environmental effects involved.

Furthermore, the application heavily relies on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent on the premise that environmental harm will be mitigated at a later stage hinders any meaningful evaluation of the effectiveness of these measures and the assessment of residual impacts. This deferral of critical information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation be clearly identified prior to determination.

Additionally, there are substantial evidential deficiencies within the report. These include gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Consequently, this leads to uncertainty about the scale and significance of impacts, particularly in cases where negligible or non-significant effects are claimed without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, generating scientific uncertainty that cannot align with statutory requirements.

As a result, the application does not meet the evidential threshold established under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Moreover, the proposal fails to demonstrate adherence to the National Planning Framework 4, which includes mandates regarding 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 undefined design envelope, the absence of specified mitigation measures, and the existing gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings preclude a lawful and thorough assessment of environmental effects, leaving the competent authority unable to determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application lacks a structured and evidence-based assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment

regime. It does not provide a reasoned comparison of realistic alternatives based on their environmental effects but instead presents a narrative of project evolution. This approach does not adequately demonstrate that less harmful options have been identified, assessed, and preferred over more damaging solutions.

There is a noticeable absence of transparent comparisons concerning alternative offshore locations, development scales, or design configurations. Specifically, the developer has not shown that they have seriously considered positioning the turbines further offshore, which would likely reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline, as well as the critical role of proximity to shore in assessing impact, the lack of such analysis precludes any conclusion that the proposed siting is the least damaging option.

The deficiencies in the application also extend to the assessment of cable routing and landfall, revealing insufficient evidence that alternative routes have been thoroughly examined to avoid or mitigate impacts on sensitive receptors. This includes significant areas of cultural and spiritual importance, such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis demonstrates that mitigation by design has not been implemented, resulting in an over-reliance on post-design mitigation measures.

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

From a policy standpoint, this inadequacy undermines compliance with National Planning Framework 4, particularly regarding 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 evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The application fails to adequately assess marine ecology and protected species in the West Lewis coastal environment, which is a biologically active and sensitive marine system. The deficiencies in baseline data and methodologies applied result in an unreliable understanding of ecological receptors. A significant oversight involves the European Protected Species, otters, whose use of coastal areas for foraging and movement has not been properly recognised. Without consideration of their core foraging range and behavioural patterns, potential impacts from construction disturbances, noise, and increased activity have not been adequately evaluated, undermining conclusions about significant effects on this species.

Further issues arise in the assessment of basking sharks, where reliance on aerial surveys creates a risk of detection bias, especially under Atlantic conditions. This methodology is likely to underestimate their presence, particularly when compared to established land-based observations that show frequent use of these waters. The omission of this data leads to an incomplete baseline and further diminishes the reliability of the assessment's conclusions.

These methodological shortcomings indicate that the conclusions drawn regarding negligible or non-significant effects are based on assumptions rather than solid evidence. Moreover, insufficient baseline data hinders the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces considerable uncertainty about the real risks facing marine species and habitats.

From a regulatory standpoint, the application does not adhere to the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been adequately identified or evaluated. The level of uncertainty introduced obstructs the ability to exclude adverse effects beyond reasonable scientific doubt, which necessitates the application of the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

In summary, the assessment's reliability is compromised by incomplete baseline data, flawed methodologies, and unfounded conclusions. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, culminating in the overall assertion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a troubling inconsistency, asserting that there will be no significant adverse effects while simultaneously making a Habitats Regulations derogation case, which is necessary only when significant harm is anticipated. This contradiction raises serious doubts about the reliability of the assessment and indicates that the conclusions drawn lack support from the underlying evidence. Moreover, the assessment inadequately addresses the consequences for seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda. It fails to sufficiently consider the significance of these feeding grounds, particularly given that the reliance on modelling approaches introduces uncertainty, especially for species in decline, including Kittiwakes and Fulmars.

The ornithological assessment is fundamentally flawed, containing significant evidence gaps and internal inconsistencies that undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. However, the application does not convincingly demonstrate that these species will not be adversely impacted. Critical foraging areas and migratory pathways are situated near the development, yet the assessment falls short in evaluating the implications of displacement, collision risks, or habitat loss.

Additionally, the siting of turbines within a recognized migratory corridor creates a significant risk, forming a barrier along a primary flight path utilised 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 and the potential effects on species with relatively small global populations.

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

The identified deficiencies also indicate a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to convincingly demonstrate that internationally important seabird populations will not be adversely affected puts the proposal in direct conflict with national policy. Ultimately, the assessment is unreliable due to its internal inconsistencies, methodological shortcomings, and lack of adequate evidence. These failures obstruct a thorough evaluation of the impacts and support the overall conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment presented regarding cultural heritage and community identity is fundamentally flawed, failing to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. Instead of acknowledging the ongoing social, cultural, and spiritual roles that heritage plays within the community, the application adopts a reductive viewpoint, treating heritage as isolated and static assets.

A significant shortcoming is evident in the handling of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations for burial and spiritual practices, yet they are incorrectly classified as static features in the assessment. This oversight ignores their ongoing usage, significance, and the potential impact of development on their surroundings. Such mischaracterisation results in an incomplete understanding of cultural effects and dismisses their importance to community life.

Moreover, the assessment neglects intangible cultural heritage elements such as the Gaelic language, local traditions, and the historical bond between the community and the coastal environment. These aspects are pivotal to the area's identity but are entirely omitted from the assessment, leading to a critical deficiency. Without addressing these components, the development's cultural impact remains inadequately understood.

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

speaking population embodies a unique cultural identity akin to that of an Indigenous People; however, the lack of a process for Free, Prior and Informed Consent calls into question the legitimacy of the assessment. This failure to engage meaningfully undermines established principles of participation in decisions that affect cultural and environmental interests.

A notable procedural failing 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 is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders any determination unlawful.

From a policy standpoint, the identified deficiencies contradict the National Planning Framework 4, particularly concerning the preservation of historic assets and locations. The neglect of both tangible and intangible heritage, along with the failure to recognise living cultural practices, signifies a clear deviation from policy expectations.

In summary, the combined failure to assess living heritage, intangible cultural value, community rights, and compliance with statutory obligations leads to a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to offer a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises significant concerns regarding the assessment of social impacts, health, and wellbeing. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report remains unpublished. This absence creates a notable evidential gap, hindering both public understanding and the competent authority's capacity to grasp the full scope of social risks highlighted in the developer’s research.

Summaries that are available reveal that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement with the community and are therefore not mere speculation. Nonetheless, the lack of disclosure of the complete assessment limits proper scrutiny and undermines the significance of these findings in the decision-making process.

The proposal is also viewed as a threat to community identity and cohesion, with findings indicating “cultural loss” identified in the developer’s own research. Despite these critical insights, they have not been sufficiently integrated into the main application or given the weight they deserve. The decision to withhold the full Social Impact Assessment obscures the true human and social cost associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process.

A comprehensive understanding of social, economic, and health impacts is vital for developments of this scale, particularly in relation to community character and functioning. Without the complete dataset, the application fails to provide an adequate evidential basis to assess the balance between potential benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4 concerning health and wellbeing. Developments must promote positive health outcomes and mitigate harm, yet the available evidence suggests that there are existing adverse effects that remain undisclosed. Without the full assessment, it is impossible to demonstrate compliance with this policy.

The implications of these procedural shortcomings are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation due to the absence of the full Social Impact Assessment. This represents a material omission in the application and a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal presents significant deficiencies in its assessment of seascape, landscape, and visual impacts, failing to adequately reflect the scale of change and the sensitivity of the receiving environment. The West Lewis coastline is characterised by its open Atlantic horizon, an undeveloped landscape, and a strong sense of remoteness. The addition of large-scale turbines situated near the shoreline would result in a continuous industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the assessment does not sufficiently convey the extent of this visual change. The size and proximity of the turbines would dominate the views from residential areas, historic sites, and commonly visited coastal locations. Consequently, this would have a direct negative effect on visual amenity and diminish the essential qualities of naturalness and remoteness. The evaluation fails to adequately express this level of impact or its significance within the context of such a sensitive landscape.

Concerns regarding methodology arise from the selection and presentation of visual viewpoints. Evidence indicates that certain viewpoints may not adequately 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 extent of visual impact has been understated, thereby compromising the reliability of the assessment.

Additionally, the assessment neglects to consider the interconnectedness of

landscape, seascape, and cultural heritage. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, are situated within a broader landscape context linked through visual and spatial relationships to the Atlantic horizon. By treating these assets in isolation, the assessment fails to recognise their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the protection of natural spaces and historic assets. The degree of change is at odds with the necessity to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of compliance with policy requirements.

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

In summary, the assessment does not accurately represent the scale of impact, the sensitivity of the environment, or the interrelated nature of landscape and heritage. These shortcomings hinder a dependable evaluation and strengthen 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 application lacks a thorough evaluation of fisheries and marine life, failing to assess the ecological and socio-economic impacts adequately. The waters off the West Lewis coast host a rich marine ecosystem and an active fishing industry. However, the application does not prove that these habitats and uses can be preserved without major disruption.

A key concern is the assumption that fishing activities can be moved without negative effects. There is no evidence that alternative fishing areas are available or can handle the added strain. This is a critical gap, as displacing fishing efforts could lead to overfishing in other areas, negatively impacting the local fishing fleet's economy. Without a well-supported assessment, the effects on fisheries and local livelihoods remain unclear.

Additionally, the proposal poses serious risks to marine species, particularly due to underwater noise during construction. High-energy hammer piling for long periods is expected to disturb marine life across extensive areas, including dolphins. The anticipated disruption to a large portion of the local bottlenose dolphin population raises significant concerns, yet the application minimizes these effects without adequate evidence.

There is a notable inconsistency in the application, as it acknowledges the requirement for licences to harm European Protected Species while simultaneously claiming the impacts are negligible. This contradiction questions the reliability of the assessment and raises issues about compliance with the Habitats Regulations, especially when anticipated harm necessitates legal permission.

Furthermore, the assessment overlooks the cumulative impacts from various pressures such as habitat disturbance, noise pollution, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential to understand the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not show adherence to the National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, hindering any assertion of sustainable development.

In summary, the gaps in evidence regarding fishing displacement, the minimization of acoustic impacts, and the internal contradictions lead to an incomplete and unreliable assessment. These shortcomings obstruct a thorough evaluation of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is lacking and does not fully consider the impacts of what constitutes a single integrated project. The offshore turbines and onshore works are closely linked but assessed separately, leading to a fragmented evaluation that masks the true extent of the environmental and socio-economic effects.

Key onshore components include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. These activities require excavation through areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive habitat. The application fails to offer a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By neglecting to assess the onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components be considered collectively; however, the disconnection between offshore and onshore elements leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

Moreover, the proposal presents substantial risks to sensitive habitats, such as machair systems and peatland environments, which benefit from policy protection. The

application does not sufficiently demonstrate that impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been implemented, creating a significant evidential gap regarding biodiversity protection.

Concerns also arise about carbon balance, as the disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy development. The application does not adequately address this critical issue or prove that the overall carbon balance remains advantageous.

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

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 conflicts with both the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further diminishes the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife represents a significant oversight within the Environmental Impact Assessment. The West Lewis coastline boasts remarkably dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposal includes the installation of permanent red aviation lighting that will be visible over extensive distances, leading to a continuous and intrusive “wall of light” effect on the western horizon, fundamentally changing the night-time landscape.

Moreover, the application fails to evaluate the implications of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This lack of consideration is particularly concerning given the critical role dark skies play in the identity of the area and the growth of sectors such as astro-tourism. The resulting gap in the overall assessment of the landscape and environment is evident.

Equally troubling is the absence of an evaluation of the impacts on nocturnal wildlife. Notably, species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application lacks any lighting impact assessment or phototaxis study, meaning it does not adequately consider how aviation lighting may affect these species or contribute to increased mortality rates.

The reliance on daytime survey data in the ornithological assessment further exacerbates this issue, as it fails to account for nocturnal activity or associated hazards. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been taken into account. The absence of site-specific data for night-time creates a crucial gap in understanding the ecological impacts involved.

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

From a policy standpoint, this omission is at odds with National Planning Framework 4 concerning the protection of natural spaces and the maintenance of environmental quality. Additionally, it undermines the comprehensive evaluation of landscape and seascape impacts, as the night-time character is an essential component of the environment.

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

TOURISM

The assessment of the tourism impacts is inadequate and does not evaluate the economic and social consequences for an important sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscape, dark skies, and sense of remoteness. While the application states that 86% of visitors are attracted by the scenery, it lacks a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application fails to model the impact of industrialisation on the seascape and the loss of environmental quality on Tourism Gross Value Added or overall economic resilience. This lack of analysis means it is impossible to determine whether the development would provide a net economic benefit or harm a vital and expanding sector.

Additionally, the assessment overlooks the significance of environmental quality in promoting tourism, including the value of unspoiled landscapes and dark skies for visitor experience and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further highlights this shortcoming, leaving a major gap in understanding the impacts on a recognised and growing segment of the local

economy.

In an island community with limited economic diversity, the neglect of tourism impact assessments poses broader implications for employment, local businesses, and community sustainability. The failure to conduct a proper Island Communities Impact Assessment means these economic vulnerabilities have not been evaluated as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly regarding economic impact and the need to show net benefits. It also contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

Overall, the inability to quantify tourism impacts, assess environmental factors that drive visitor behaviour, and acknowledge the island's economic dependency results in a significant evidential gap. This hampers 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 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.

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: 933DB181

Member of the public 921

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The scale of the proposal is unprecedented in this location, with large turbines positioned in close proximity to the shoreline. This introduces significant concerns regarding landscape capacity, visual dominance, and environmental impact.

The application does not provide an adequate evidential basis for a lawful determination. Critical environmental data is missing, baseline information is limited and inconsistent, and key aspects of the proposal remain undefined. The use of a flexible design framework prevents a clear understanding of likely significant effects, while the reliance on mitigation measures that have not yet been specified means their effectiveness cannot be assessed. Consequently, the documentation does not enable a full or informed understanding of environmental, cultural, or community impacts. Claims of negligible or non-significant effects are not supported by robust evidence.

There are clear and substantive conflicts with policy. The proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly evident concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate that national requirements to protect biodiversity, climate interests, and environmental integrity can be met. Such conflicts directly affect the statutory tests required for consent and undermine the ability of the competent authority to conclude that the development is acceptable in policy terms.

Given the absence of sufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete and incapable of supporting a lawful determination. In these circumstances, the precautionary principle must apply. The development is located off the west side of the Isle of Lewis, an area defined by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The concerns raised regarding the compatibility of the proposal with statutory requirements, national policy, and the principles of sustainable development are fundamental.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a complete, transparent, or reliable overview of the anticipated environmental effects of the proposal. The adoption of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates

considerable uncertainty. This uncertainty hampers the consistent application of a worst-case scenario, compromising the integrity of the assessment. As a result, the presented impacts may not accurately reflect the actual development, hindering both public understanding and the competent authority's ability to grasp the true extent of environmental effects.

The application places heavy reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. As such, consent is sought based on the premise that environmental harm will be managed later. This approach undermines any meaningful evaluation of effectiveness or assessment of residual impacts. Deferring critical information to post-consent stages is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

There are also notable evidential deficiencies, which include gaps in baseline data, limitations in methodology, and the use of assumptions rather than site-specific evidence. These issues lead to uncertainty about the scale and significance of impacts, especially where findings of negligible or non-significant effects are presented without robust supporting data. Insufficient 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 satisfy the evidential threshold needed under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This triggers the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to show compliance with National Planning Framework 4, which includes stipulations on biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been fully assessed or that appropriate safeguards are in place.

Overall, the reliance on an undefined design envelope, the lack of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and robust 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 lacks completeness and reliability, failing to provide an adequate understanding of the ecological receptors in the West Lewis coastal environment. This area represents a highly sensitive and biologically active marine system; however, the baseline data presented is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, or habitat use of various species. Consequently, the assessment fails to establish a sound evidential basis for evaluating potential impacts.

A significant gap in the assessment pertains to otters, classified as a European Protected Species. The application neglects to properly recognise and evaluate their active utilisation of coastal areas for foraging and movement. The absence of consideration for their core foraging range and behavioural patterns leads to an inadequate assessment of the potential effects arising from construction disturbance, noise, and increased activity. This oversight compromises the conclusions drawn regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks suffers from methodological shortcomings, particularly the reliance on aerial surveys which introduce notable detection bias under Atlantic conditions. Such an approach is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The omission of relevant data further contributes to an incomplete baseline and diminishes the reliability of the conclusions made.

These methodological deficiencies result in conclusions of negligible or non-significant effects that are based on assumptions rather than solid evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including variations across seasons and broader ecosystem interactions. This creates uncertainty regarding the actual level of risk posed to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application contains significant deficiencies that compromise the reliability of the ornithological assessment. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already experiencing declines. 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 have been identified in the development's location, yet the assessment does not adequately evaluate the risks of displacement, collision, or habitat loss.

A troubling contradiction is evident in the developer's conclusions, which assert no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, a measure that is only necessary when significant harm is anticipated. This inconsistency raises doubts about the assessment's reliability and suggests that the conclusions drawn are not backed by the evidence provided. The assessment lacks sufficient evidence regarding the potential impacts on seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. Notably, the significance of these feeding grounds is not thoroughly considered, and the modelling methods employed introduce uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies likely underestimate mortality, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

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

Regulatory considerations indicate that the application does not meet the evidential threshold necessary to assert no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside data gaps and limitations in modelling, suggests that the standard of beyond reasonable scientific doubt has not been satisfied. This invokes the precautionary principle and hinders a lawful conclusion that could support consent. Furthermore, these identified deficiencies indicate non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will remain unaffected places the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

A significant shortcoming is evident in the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites

for burial and spiritual practices, yet they are mischaracterised as mere static features. This oversight fails to acknowledge their continued use and the implications of development on their surroundings, leading to an incomplete understanding of cultural impacts and a disregard for their importance in community life.

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The overall assessment regarding social impacts, health, and wellbeing is seriously lacking in transparency and cannot meet legal standards for evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, but the complete report has not been made available. This creates a significant gap in evidence, making it impossible for both the public and the appropriate authority to grasp the full range of social risks uncovered through the developer's own research.

Summaries that are currently available suggest that residents are suffering from measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These effects arise from direct engagement and are not speculative in nature. However, the lack of access to the full assessment hampers proper scrutiny of these findings and diminishes the ability to evaluate their significance during the decision-making process.

Moreover, there is evidence suggesting that the proposal poses a direct threat to community identity and cohesion, with a risk of "cultural loss" highlighted in the developer's findings. Despite this, such impacts have not been adequately included in the main application or given the necessary consideration. The failure to release the complete Social Impact Assessment obscures the real human and social costs associated with the development.

This issue of transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this nature, especially when community character and functionality could be at risk. By withholding the full dataset, the application does not provide a complete evidential basis necessary for weighing the benefits against the harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments should support positive health outcomes while avoiding harm. However, the evidence at hand indicates existing negative effects that have not been fully acknowledged. Without the complete assessment, compliance with this policy cannot be substantiated.

The implications of these procedural issues are significant. The competent authority is unable to carry out a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This omission represents a major flaw in the application and a failure to meet the evidential requirements of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, alongside evidence of current adverse impacts, leaves the assessment incomplete and untrustworthy. This inadequacy prevents a lawful determination and further supports the assertion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual, seascape, and landscape impacts is critically inadequate and fails to reflect both the scale of change and the sensitivity of the environment. The coastline of West Lewis is characterised by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. Introducing large-scale turbines near the shoreline would establish a continuous industrial presence, fundamentally altering this character and resulting in a permanent and irreversible transformation of the landscape.

Furthermore, the application does not accurately portray the extent of the visual change. The size and proximity of the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, which would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment fails to adequately communicate the significance of this impact in relation to such a sensitive landscape.

There are methodological issues concerning the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This suggests that the magnitude of visual impact could be understated, which calls into question the reliability of the assessment.

Moreover, the assessment overlooks the interconnectedness of landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context linked visually and spatially to the Atlantic horizon. By treating these sites as isolated entities, the assessment fails to acknowledge their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these critical connections, altering the context in which heritage assets are experienced and disrupting their relationship with the natural horizon. This situation represents not just a visual impact but a wider cultural and spatial detriment that the application has not sufficiently assessed.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 in its commitment to protecting natural spaces and historic assets. The scale of change is incompatible with the necessity to preserve landscape character, visual amenity, and the setting of culturally important sites. The lack of a thorough worst-case assessment further weakens any assertions of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks presented in the application is materially deficient, lacking the necessary detail to effectively evaluate potential environmental impacts. The proposal involves significant seabed preparation and

installation activities within a challenging high-energy Atlantic environment. However, it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that are to be established after consent, which inhibits any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is particularly alarming given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to disturbances from sediment and contamination. While the application does acknowledge risks associated with sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide sufficient details on the prevention, control, or monitoring of these risks.

Furthermore, there is uncertainty surrounding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without comprehensive modelling and explicitly defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty extends to the potential effects on marine species and habitats that have been 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 ability to evaluate whether appropriate safeguards are in place for responding to pollution events. This introduces procedural risks and compromises the capacity of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the postponement of crucial environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be assessed before consent is granted. In the absence of this information, a lawful determination cannot be achieved. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, inadequate management plans, and uncertainty regarding potential impacts collectively render the assessment incomplete. These shortcomings hinder a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is fundamentally flawed.

FISHERIES AND MARINE LIFE

The evaluation of the potential impacts on marine life and fisheries is inadequate and lacks a thorough assessment of both ecological and socio-economic effects. The fishing industry is active in the waters off the West Lewis coast, which also hosts a diverse marine ecosystem. However, the application does not sufficiently demonstrate that these activities and habitats can be safeguarded from significant disruption.

A major concern is the assumption that fishing activities can be moved without repercussions. The application does not provide evidence that alternative fishing locations are available, accessible, or able to handle increased pressure. This is a critical gap, as displacing fishing efforts risks overfishing in other areas and could lead to broader economic challenges for the local fishing fleet. Without a clear, evidence-based evaluation, the consequences for fisheries and local livelihoods remain unclear.

The proposal poses notable risks to marine species, particularly due to the underwater noise produced during construction. The extended use of high-energy hammer piling is expected to create disturbances over considerable distances, potentially affecting marine mammals such as dolphins. There are serious worries regarding the predicted disruption to a significant segment of the local bottlenose dolphin population, yet the application diminishes the importance of these effects without sufficient evidence.

The application also exhibits a clear contradiction by recognising the necessity for licences to allow harm to European Protected Species while simultaneously claiming that the impacts are negligible. This inconsistency damages the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal approval.

Furthermore, the assessment neglects to consider the cumulative impacts resulting from various pressures, such as habitat disruption, noise, and fishing displacement. Without a thorough examination of these combined effects, it is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the development can operate alongside existing marine users or prevent unacceptable harm to marine biodiversity, which obstructs any conclusion regarding the proposal's sustainability.

Overall, the deficiencies in evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal contradictions lead to an incomplete and unreliable assessment. These issues hinder a proper evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is significantly lacking and does not adequately account for the full range of impacts from what constitutes a single integrated project. The offshore turbines and the onshore works are fundamentally interconnected; however, their separate assessments lead to a disjointed evaluation, obscuring the true magnitude of environmental and socio-economic consequences.

Key onshore components entail cabling across protected moorland, the construction of a substation near Stornoway, and the development of associated access infrastructure

through sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive area. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

The lack of consideration for onshore impacts obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be reviewed together. The disjointed evaluation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not fully realised. There are considerable risks to sensitive habitats, including machair systems and peatland environments, which benefit from policy protection. The application does not sufficiently demonstrate that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been considered, creating a significant evidential void regarding biodiversity protection.

Concerns also arise regarding carbon balance, as the disturbance of peatland can lead to the release of stored carbon, potentially resulting in a carbon debt that undermines the objectives of renewable energy development. This issue has not been adequately addressed by the application, nor has it been shown that the overall carbon balance remains advantageous. Furthermore, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence that the requisite consents or processes have been initiated, raising doubts about deliverability and lawful implementation.

From a policy standpoint, the failure to evaluate the project in its entirety and to demonstrate protection of peatlands, habitats, and land use interests is inconsistent with the National Marine Plan and the National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application. Collectively, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this portion of the application incomplete and unreliable, thus obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are integral to the region's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that would be visible across long distances, resulting in a continuous and intrusive effect on the western horizon, fundamentally altering the night-time environment.

The Environmental Impact Assessment fails to evaluate the consequences of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly significant due to the importance of dark skies to the area's identity and the growing tourism sector, including astro-tourism. The lack of consideration for these impacts creates a clear deficiency in the overall landscape and environmental assessment.

Moreover, there is no analysis of the effects of artificial lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to such lighting, which can lead to disorientation and an increased risk of collision. The application does not include any impact assessment regarding this lighting or a phototaxis study, thus failing to evaluate the potential effects on these species or the risk of increased mortality.

Additionally, the reliance on daytime survey data in the ornithological assessment fails to capture the nocturnal activities or associated risks. Species like Kittiwakes, which might forage or migrate during the night, are also vulnerable to disorientation from artificial lighting, yet this risk has not been evaluated. The absence of specific night-time data creates a critical gap in understanding the ecological impacts.

Without an assessment of nocturnal effects, it remains uncertain whether protected species or designated sites would face adverse impacts. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt is not achieved, which engages the precautionary principle and obstructs lawful determination.

From a policy standpoint, this omission contravenes the National Planning Framework 4 regarding the protection of natural environments and the maintenance of environmental quality. Furthermore, it undermines the wider evaluation of landscape and seascape impacts, as the character of night-time settings is a fundamental component of the environment.

In summary, the lack of any 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 inadequacy of the tourism impact assessment is striking, as it neglects to analyse the economic and social repercussions for a vital sector of the Isle of Lewis economy. The growth of tourism has been remarkable, increasing from £65 million in 2017 to over £81.5 million, and this sector supports more than 1,000 jobs, making up to 16% of the island's economy. Despite its significance, the application fails to model how the proposed industrialisation of the seascape and degradation of environmental quality would affect Tourism Gross Value Added or the overall resilience of the economy. This oversight raises questions about whether the development would actually provide a net economic benefit or jeopardise a thriving sector.

Furthermore, the application does not adequately address the crucial role that environmental quality plays in attracting visitors. The wild coastline, pristine landscapes, and dark skies are fundamental to the tourist experience, yet the assessment omits a Dark Skies Assessment, leaving a substantial void in

understanding the potential impact on growing markets such as nature-based tourism and astro-tourism. This lack of consideration hampers the ability to evaluate how large-scale offshore infrastructure could change visitor behaviour, numbers, and economic contributions.

The deficiencies in assessing tourism impacts have broader implications for employment, local businesses, and community sustainability in an island community that lacks economic diversification. The failure to carry out a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been examined, which is necessary as stipulated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4, particularly regarding economic impact and the requirement to prove net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector and falls short of providing sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal demonstrates a significant failure to meet the requirements of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. This application reiterates the central issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

There are substantial gaps in the evidential basis needed for a thorough determination. The use of an undefined design envelope, reliance on unspecified mitigation measures, and the exclusion of essential impact pathways—including nocturnal wildlife, comprehensive onshore infrastructure, and tourism consequences—raise serious concerns. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a complete understanding of the likely significant effects or residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, and the non-disclosure of the complete Social Impact Assessment constitutes a significant omission. These deficiencies hinder the competent authority from effectively evaluating impacts on community wellbeing, cultural identity, and economic resilience, thereby

rendering the application unsuitable for determination.

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

Environmental risks associated with the proposal are uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain areas, inconsistent. The evidential threshold required to discount 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 also lead to considerable and irreversible changes to a landscape of high sensitivity. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the negative effects on tourism represent enduring consequences that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination. The combination of significant information deficiencies, policy inconsistencies, and unresolved environmental risks obstructs the possibility of a lawful and evidence-based decision. The competent authority should either reject the application on these grounds or employ the appropriate regulatory mechanisms to demand the submission of the missing information.

In light of these concerns, I respectfully request that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

To impose this on our island is wholly wrong. It will change our island forever. The impact on everything will be catastrophic.

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: DFDA8F33

Member of the public 922

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the applicable marine licensing and Environmental Impact Assessment regimes. It draws upon a review of the Environmental Impact Assessment Report and associated documentation, highlighting various deficiencies related to planning, environmental matters, cultural aspects, and procedural elements. The development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. There are profound concerns regarding the scale, proximity, and design of the proposal, particularly in terms of its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. Key environmental data is absent, baseline information is both limited and inconsistent, and crucial elements of the proposal remain undefined. The flexible design framework employed obscures the understanding of likely significant effects, and the reliance on unspecified mitigation measures precludes any assessment of their effectiveness. Consequently, the documentation fails to provide a full or informed understanding of the impacts on environmental, cultural, or community aspects, and claims of negligible or non-significant effects are not substantiated by robust evidence.

There are significant and clear policy conflicts at play. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate that the national requirements to safeguard biodiversity, climate interests, and environmental integrity are achievable. Such conflicts are directly linked to the statutory tests necessary for consent and severely undermine the ability of the competent authority to conclude that the development meets policy acceptability.

The unprecedented scale of the proposal raises significant concerns due to the large turbines being positioned in close proximity to the shoreline, leading to worries about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and evident policy non-compliance illustrates that the application is incomplete and incapable of receiving a lawful determination. In light of these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies within the Environmental Impact Assessment Report are substantial and undermine its reliability, as it fails to provide a full and transparent account of the potential environmental effects associated with the proposal. The introduction of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, leads to considerable uncertainty. This uncertainty hinders the application of a worst-case scenario analysis, thereby compromising the integrity of the assessment. As a result, the impacts detailed may not accurately reflect the actual development constructed, limiting both public understanding and the competent authority's ability to grasp the true extent of environmental effects.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under these conditions implies that environmental harm will be addressed subsequently, which obstructs meaningful evaluation of the effectiveness of these measures and precludes proper assessment of residual impacts. Such deferral of essential information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly established before any determination is made.

Additionally, the report is marred by significant evidential deficiencies, including incomplete baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. These shortcomings generate uncertainty regarding the scale and significance of impacts, especially in instances where negligible or non-significant effects are posited without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that is incompatible with statutory requirements.

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

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

ASSESSMENT OF ALTERNATIVES

The inadequacy of the assessment of alternatives fundamentally undermines compliance with the statutory requirements of the Environmental Impact Assessment regime. The application fails to provide a structured and reasoned comparison of realistic alternatives based on environmental effects, instead offering a narrative account of the project's evolution. This method does not adequately illustrate that less harmful options have been identified, assessed, and chosen over more damaging solutions.

In terms of alternative offshore locations, development scales, or design configurations, the application lacks a transparent or evidence-based comparison. Notably, it does not show that the developer has genuinely considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be significantly reduced. The sensitive nature of the West Lewis coastline and the critical role of proximity to shore in determining impact highlight the shortcomings of the analysis, making it impossible to conclude that the proposed siting is the least damaging option available.

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

Consequently, the application does not demonstrate that environmental harm has been minimised through effective site selection, layout, and infrastructure routing. This shortfall indicates a failure to adhere to the established mitigation hierarchy, leaving the competent authority unable to ascertain whether there are less harmful and more suitable alternatives. In the absence of a robust alternatives assessment, it is impossible to conclude that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency compromises adherence to National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission, contributing to the overall conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The West Lewis coastal environment is highly sensitive and biologically active. However, the assessment of marine ecology and protected species fails to provide a complete and reliable understanding of ecological receptors in this area. The baseline data is incomplete, and the methodologies used do not adequately capture species presence, behaviour, and habitat use. Consequently, the assessment does not offer a

sound evidential basis for evaluating potential impacts.

One significant oversight involves otters, a European Protected Species. The application does not properly recognise and assess their use of coastal areas for foraging and movement. This neglect of their core foraging range and behavioural patterns results in inadequate consideration of the potential effects of construction disturbance, noise, and increased activity. Such deficiencies undermine any conclusions about the absence of significant effects on otters.

In assessing basking sharks, the application relies on aerial surveys, which introduce significant detection bias, especially in Atlantic conditions. This method is likely to underestimate their presence, particularly when compared to established land-based observations showing frequent usage of these waters. The failure to incorporate relevant data leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

Methodological shortcomings mean that conclusions of negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of sufficient baseline data also hinders meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4, as it fails to identify or assess protected species adequately. This level of uncertainty prevents the dismissal 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 unsupported conclusions renders the assessment unreliable. These issues impede a thorough evaluation of impacts on marine ecology and protected species and lead to the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamentally flawed ornithological assessment, marked by significant gaps in evidence and internal inconsistencies that compromise its conclusions. The site is situated within crucial foraging areas and migratory pathways along the west coast of the Isle of Lewis, which is home to internationally important seabird populations that are already experiencing decline. However, the application fails to demonstrate, to the requisite evidential standard, that these species will not be adversely affected.

A critical contradiction arises in the assessment, as the developer asserts there are no significant adverse effects while simultaneously putting forward a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This

inconsistency casts doubt on the assessment's reliability and suggests that the conclusions drawn are unsupported by the evidence presented. The assessment does not adequately substantiate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is insufficiently considered, and reliance on modelling approaches injects uncertainty, especially for species facing severe decline, such as Kittiwakes and Fulmars. The methodologies employed are prone to underestimating mortality, particularly given that baseline data may be incomplete and behavioural responses inadequately understood.

The positioning of turbines within a recognised migratory corridor creates an additional and significant risk, effectively serving as a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

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

Furthermore, the identified deficiencies constitute non-compliance with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected positions the proposal in direct opposition to national policy.

Ultimately, 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 collectively lead to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity, treating the West Lewis coastline merely as a collection of isolated, static assets rather than recognising it as a vibrant cultural landscape where environment, language, tradition, and community intertwine. This reductive approach overlooks the ongoing social, cultural, and spiritual roles that these heritage elements play within the community.

Particularly concerning is the inadequate treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial sites and places of spiritual significance, yet the assessment characterises them as static features, ignoring their continued use and the implications of development on

their context. This mischaracterisation leads to an incomplete understanding of the cultural effects and dismisses their importance in community life.

Moreover, the assessment neglects intangible cultural heritage, including the Gaelic language, traditions, and the community's deep-rooted relationship with the coastal environment. These aspects are essential to the area's identity, yet they are entirely omitted from the evaluation, representing a significant gap. Without recognising these factors, the true cultural impact of the development remains unclear.

There are additional concerns regarding community rights and the lack of engagement. The Gaelic-speaking population, recognised as possessing a distinct cultural identity akin to that of an Indigenous People, has not been involved in a process of Free, Prior and Informed Consent. This absence of genuine participation undermines the legitimacy of the assessment and fails to uphold established principles of inclusion in decisions affecting cultural and environmental matters.

A significant procedural oversight is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The lack of this assessment means that the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering any determination legally deficient.

From a policy standpoint, these shortcomings position the proposal in direct conflict with National Planning Framework 4, particularly concerning the preservation of historic assets and places. The neglect to consider both tangible and intangible heritage, along with living cultural practices, clearly diverges from established policy requirements.

Overall, the combined failure to evaluate living heritage, intangible cultural value, community rights, and statutory requirements creates a significant evidential gap. The cultural impacts of the development have not been appropriately assessed, and the application fails to establish a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The current evaluation of social impacts, health, and wellbeing is lacking in transparency and is materially deficient. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, but the full report has not been published. This omission creates a significant evidential gap, making it difficult for both the public and the competent authority to grasp the full range of social risks identified by the developer's research.

Available summaries suggest that residents are facing measurable levels of stress, anxiety, and concern related to the scale and proximity of the proposed development. These impacts arise from direct engagement with the community and are not speculative in nature. Nonetheless, the failure to release the complete assessment

inhibits thorough scrutiny of the findings and restricts the ability to evaluate their significance in the decision-making process.

Moreover, the proposal is seen as a threat to community identity and cohesion, with concerns about "cultural loss" highlighted in the developer's findings. Despite this, these social impacts have not been adequately integrated into the application or afforded the necessary weight. The absence of the full Social Impact Assessment clouds the understanding of the genuine human and social 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 implications is critical for developments of this magnitude, especially when community character and functionality are at stake. The failure to provide complete data means that the application does not offer a thorough evidential basis to assess the balance of benefits and harm.

From a policy viewpoint, the application does not show adherence to National Planning Framework 4 regarding health and wellbeing. It is essential for developments to support positive health outcomes and mitigate harm; however, the evidence available indicates that adverse effects already exist and have not been fully revealed. Without the complete assessment, demonstrating compliance with this policy is not achievable.

The procedural consequences are notable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This lack of information constitutes a material omission within the application and fails to meet the evidential standards required by the Environmental Impact Assessment framework.

In conclusion, the failure to disclose the complete Social Impact Assessment, along with evidence of existing adverse effects, results in an incomplete and unreliable assessment. This undermines the ability to make a lawful determination and strengthens the argument that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the potential impacts on seascape, landscape, and visual aspects is fundamentally lacking and does not truly capture the extent of the changes or the delicate nature of the environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a strong feeling of remoteness. The proposal to install large-scale turbines near the shoreline would introduce a continuous and imposing industrial presence, drastically altering this character and leading to a permanent and irreversible change in the landscape.

Moreover, the application fails to adequately portray the extent of the visual alterations expected. Due to their size and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations. This would have a direct

effect on visual amenity, diminishing the essential qualities of naturalness and remoteness. The assessment does not accurately reflect the significance of these impacts within such a sensitive landscape.

Concerns also arise regarding the methods used to select and present visual viewpoints. There is evidence suggesting that these viewpoints may not sufficiently represent the most sensitive receptors or the worst-case scenarios, particularly concerning significant cultural heritage sites and landscapes of high value. This poses a risk that the severity of the visual impact has been minimised, calling into question the reliability of the assessment.

Another notable shortcoming is the failure to evaluate the interconnected relationship among landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context, linked visually and spatially to the Atlantic horizon. The assessment treats these sites as separate entities rather than recognising their interdependence, leading to an incomplete understanding of the impacts on their context and cultural significance.

The industrialisation of the seascape would disrupt these connections, changing how heritage assets are perceived and severing their ties to the natural horizon. This represents not just a visual impact but a wider cultural and spatial harm that has not been sufficiently examined within the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural areas and historical assets. The extent of the changes is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of policy compliance.

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

In conclusion, the assessment fails to accurately depict the extent of the impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a trustworthy evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents a significant deficiency in the assessment of construction and pollution risks, lacking the necessary detail to evaluate potential environmental effects. Notably, it involves extensive seabed preparation and installation works within a high-energy Atlantic environment, yet fails to provide fully developed Construction

Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be formulated post-consent, which obstructs a meaningful assessment of their adequacy and effectiveness.

This reliance on undefined future measures is especially troubling given the sensitivity of the surrounding environment. The West Lewis coastline is characterised by clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. Although the application recognises risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it lacks sufficient detail on the strategies to prevent, control, or monitor these incidents.

Moreover, there is uncertainty regarding the scale and behaviour of sediment plumes generated by seabed disturbance and cable installation. The absence of robust modelling and clearly defined management strategies makes it impossible to ascertain the extent, duration, or ecological consequences of such impacts. This uncertainty also encompasses the potential effects on marine species and habitats identified as sensitive within the broader assessment context.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a post-consent phase, the application fails to allow for an evaluation of whether adequate safeguards are established to address pollution events. This introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the postponement of essential environmental safeguards stands in conflict with the stipulations of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to consent; without this information, a lawful determination cannot be reached. Furthermore, the application does not 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 render the assessment materially deficient. These inadequacies hinder a thorough evaluation of construction and pollution risks and substantiate the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application concerning the development off the West Lewis coast reveals significant deficiencies in its assessment of fisheries and marine life, which undermines its reliability. The ecological evaluation does not adequately address the diverse marine ecosystem present in these waters, nor does it consider the active fishing industry. The failure to demonstrate how these vital uses and habitats can be protected or maintained without substantial disruption is concerning.

A notable flaw in the proposal is the assumption that fishing activities can be displaced

without adverse effects. There is a lack of evidence supporting the availability, accessibility, or capacity of alternative fishing grounds to accommodate increased pressure. This absence of information is critical, as the potential for overfishing in different areas could have broader economic implications for the local fishing fleet. Without a solid, evidence-based assessment, the repercussions on fisheries and local livelihoods remain unclear.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise produced during construction. The anticipated high-energy hammer piling over a prolonged period is expected to disturb a wide area, affecting species like dolphins. The predicted impact on a substantial portion of the local bottlenose dolphin population is alarming, yet the application appears to minimise these concerns without adequate supporting evidence.

The assessment contains an evident contradiction; while it acknowledges the necessity for licences to permit harm to European Protected Species, it simultaneously categorises the impacts as negligible. This inconsistency undermines the credibility of the evaluation and raises questions about adherence to the Habitats Regulations, particularly when anticipated harm necessitates legal authorisation.

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

From a policy standpoint, the application fails to demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It does not sufficiently show that the development can coexist with existing marine users or avoid unacceptable consequences for marine biodiversity, making it impossible to conclude that the proposal aligns with sustainable development principles.

In summary, the deficiencies regarding evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and untrustworthy. These shortcomings prevent an accurate evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project is fundamentally flawed, as it fails to evaluate onshore infrastructure in conjunction with offshore elements, resulting in a fragmented analysis that conceals the true magnitude of environmental and socio-economic repercussions. The offshore turbines are interconnected with onshore works, including cabling through protected moorland, the construction of a substation near Stornoway, and access routes across sensitive landscapes. These onshore activities involve excavation in areas of deep peat, notably within Barvas Moor, an essential carbon store and ecologically significant habitat. The absence of a thorough examination of these impacts hinders a complete understanding of the project's environmental footprint.

The lack of a unified assessment of both onshore and offshore impacts leads to an inadequate evaluation of cumulative effects, violating the Environmental Impact Assessment process, which mandates consideration of all project components as a whole. Consequently, the combined impacts on peatlands, habitats, and local communities remain insufficiently understood. Furthermore, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The proposal does not adequately demonstrate that the potential impacts on these habitats have been thoroughly evaluated or that effective avoidance measures have been implemented, revealing a significant evidential gap regarding biodiversity protection.

Concerns also arise surrounding carbon balance, as the disturbance of peatland may release stored carbon, leading to a carbon debt that contradicts the goals of renewable energy initiatives. The application fails to address this critical issue or prove that the overall carbon balance is favourable. Moreover, routing infrastructure through active croft land raises potential conflicts with established land use and legal rights, with the application lacking evidence that necessary consents or processes have been initiated, raising serious questions about its feasibility and compliance with legal requirements.

From a policy standpoint, the application's failure to assess the project comprehensively and to ensure the protection of peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that the impacts can be avoided or mitigated further weakens the application. Collectively, the disjointed nature of the project components, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts render this part of the application both incomplete and unreliable, ultimately obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed application introduces permanent red aviation lighting that will be visible over long distances, leading to a continuous and intrusive “wall of light” effect across the western horizon. This change fundamentally alters the night-time environment, yet the assessment of dark skies and nocturnal wildlife is entirely absent from the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which contribute significantly to environmental quality, cultural identity, and tourism value. The failure to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors is a substantial omission, particularly given the importance of dark skies to the area’s identity and its emerging tourism sectors, such as astro-tourism.

Moreover, the application neglects to assess how the proposed lighting may affect nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase collision risks. The absence of a lighting impact assessment or phototaxis study means that there is no evaluation of how

aviation lighting might influence these species or lead to increased mortality. This gap is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, yet this risk has not been addressed. The lack of site-specific night-time data creates a critical deficiency in understanding the ecological impacts of the proposed development.

Without an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, invoking the precautionary principle and hindering a lawful determination. From a policy standpoint, these omissions are inconsistent with National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, this failure undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is integral to the overall ecological context.

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

TOURISM

The evaluation of tourism impacts within the application is significantly inadequate, neglecting to consider the economic and social ramifications for a vital sector of the Isle of Lewis economy. The area's tourism thrives on its wild coastline, almost untouched landscapes, dark skies, and the feeling of remoteness. Although the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how the introduction of large-scale offshore infrastructure may influence visitor numbers, behaviours, or the overall economic contributions made by tourism.

Tourism in the region has experienced notable growth, escalating from £65 million in 2017 to over £81.5 million, which sustains more than 1,000 jobs and constitutes up to 16% of the island’s economy. However, the application does not explore how the anticipated industrialisation of the seascape and degradation of environmental quality might affect the Tourism Gross Value Added or the resilience of the broader economy. Without this critical assessment, it remains unclear whether the proposed development would provide a net economic benefit or jeopardise an established and expanding sector.

Moreover, the analysis does not adequately address the significance of environmental quality for tourism, particularly regarding unspoiled landscapes and dark skies, which are essential for visitor experiences and burgeoning markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this

shortcoming, leaving a notable absence in understanding its effects on a recognised and growing segment of the local economy.

In an island community with limited economic diversity, the oversight regarding tourism impacts has broader consequences for employment, local enterprises, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been properly examined as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate alignment with the National Planning Framework 4, particularly concerning economic impact and the necessity to illustrate net benefits. It is at odds with strategic objectives that highlight tourism as a priority growth sector and lacks sufficient evidence to enable the competent authority to evaluate the economic ramifications of the proposal.

Overall, the inability to quantify tourism impacts, analyse the environmental factors influencing visitor behaviour, and recognise the economic dependency of the island culminates in a substantial evidential gap. This gap hinders a thorough assessment of economic implications and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights serious deficiencies in meeting the standards of sustainable development, as required by statutory obligations, national policy, and evidential benchmarks. It echoes the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, when the extent of industrialisation was deemed unacceptable. This current application, while presented under a framework that places increased importance on biodiversity, peatland preservation, landscape integrity, and community welfare, fails to adequately address these priorities.

A reliable evidential foundation for the proposal is noticeably absent. There are significant gaps in baseline data, the design envelope remains undefined, and mitigation measures have not been clearly specified. Additionally, essential impact pathways—including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—are overlooked. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of potential significant effects or residual impacts.

Moreover, the process surrounding the application shows clear procedural shortcomings. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to present the complete Social Impact Assessment constitutes a critical 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.

In addition, the proposal contradicts National Planning Framework 4. It does not adequately protect biodiversity, natural environments, or cultural heritage. Furthermore, it fails to demonstrate that health and wellbeing impacts are satisfactory and lacks evidence of net economic benefits, primarily due to insufficient tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, leading to a lack of clarity regarding impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain unclear and potentially severe. Evaluations related to marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The necessary evidential threshold to eliminate adverse effects beyond reasonable scientific doubt has not been satisfied, which engages the precautionary principle and precludes a lawful conclusion regarding acceptable impacts.

Furthermore, the proposal is set to bring about 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 connections, and negative effects on tourism constitute enduring impacts that cannot be mitigated to an acceptable degree.

Overall, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, along with policy inconsistencies and unresolved environmental risks, inhibit a lawful and evidence-based decision. It is imperative that the competent authority either rejects the application on these grounds or utilises the appropriate regulatory measures to obtain the missing information.

As such, we formally request that the application for the Spiorad na Mara Offshore Wind Farm be rejected in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: E8448D35

Member of the public 923

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is informed by a thorough review of the Environmental Impact Assessment Report and its supporting documents, revealing significant planning, environmental, cultural, and procedural deficiencies.

The development's location off the west side of the Isle of Lewis is characterised by its Atlantic-facing coastline, a near-pristine environment, and a strong cultural identity. Concerns arise regarding the scale, proximity, and design of the proposed development, which call into question its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis for a lawful determination. There is a notable absence of critical environmental data, while baseline information is both limited and inconsistent. Many key aspects of the proposal remain undefined. The use of a flexible design framework obscures the understanding of likely significant effects, and the reliance on unspecified mitigation measures leaves their effectiveness unassessable. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Furthermore, the proposal exhibits clear and substantive conflicts with existing policy. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural places, cultural heritage, and health and wellbeing. There is insufficient demonstration that it meets national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests required for consent, undermining the competent authority's ability to deem the development acceptable under policy considerations.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shoreline, introduces significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of inadequate information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle is warranted.

ASSESSMENT OF ALTERNATIVES

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

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

These shortcomings also extend to cable routing and landfall assessments, where there is inadequate evidence that alternative routes have been thoroughly examined to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The lack of a clear avoidance strategy and insufficient comparative analysis suggest that mitigation by design has not been implemented, leading to an over-reliance on post-design mitigation measures.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate, failing to provide a full and dependable understanding of ecological receptors in the West Lewis coastal environment. This area is a biologically active marine system, yet the baseline data is incomplete. The methodologies used do not sufficiently capture species presence, behaviour, and habitat use, leading to a lack of sound evidence for evaluating impacts.

One significant gap involves otters, which are a European Protected Species. The application does not properly recognise or assess their active use of coastal areas for foraging and movement. Consequently, the assessment does not consider their core foraging range or behavioural patterns. This oversight means that the potential effects of construction disturbance, noise, and increased activity have not been properly evaluated, undermining claims regarding the absence of significant effects on this species.

In addition, the assessment of basking sharks shows further deficiencies. The reliance on aerial surveys creates significant detection bias, especially in Atlantic conditions. This method is likely to underestimate their presence, particularly compared to established land-based observations that indicate these waters are frequently used. Not incorporating or properly considering such data contributes to an incomplete baseline and diminishes the reliability of the conclusions.

These methodological shortcomings result in conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data also hinders meaningful assessment of cumulative and indirect impacts, including seasonal variation and wider ecosystem interactions. This uncertainty casts doubt on the actual 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. Protected species have not been correctly identified or assessed. The uncertainty introduced means that adverse effects cannot be excluded beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Under these circumstances, granting consent would not be lawful.

Ultimately, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions makes the assessment unreliable. These issues obstruct a thorough evaluation of impacts on marine ecology and protected species, contributing to the overall finding that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to meet the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. Significant gaps in evidence and internal inconsistencies within the ornithological assessment undermine its conclusions. There is a fundamental contradiction in the application, as the developer asserts no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary where significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that its conclusions are unsupported by the evidence presented.

Furthermore, the assessment does not 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 considered, and the

reliance on modelling approaches introduces uncertainty, particularly for species that are already in severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially in instances where baseline data is incomplete and behavioural responses are not entirely understood.

The siting of turbines within a recognised migratory corridor introduces a significant risk by effectively creating a barrier in a primary flight path utilised by species travelling between the United Kingdom and Iceland. The assessment does not adequately evaluate the long-term implications of sustained mortality within this corridor or the potential effects on species with small global populations.

From a regulatory perspective, the presence of contradictory conclusions, data gaps, and limitations in modelling means the standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle and obstructs a lawful conclusion in favour of consent. The deficiencies identified indicate a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

Overall, the assessment is rendered unreliable due to internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. These shortcomings prevent a thorough evaluation of impacts and contribute to the conclusion that the application does not meet the statutory requirements necessary for a proper determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is fundamentally lacking, particularly in its failure to recognise the West Lewis coastline as a dynamic cultural landscape where community, language, tradition, and environment are deeply intertwined. Rather than appreciating the ongoing social, cultural, and spiritual significance of heritage, the application adopts a reductive perspective, viewing it merely as a collection of isolated and static features.

A notable shortcoming in the assessment is the handling of culturally important sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These sites function as active burial grounds and centres of spiritual practice; however, the evaluation treats them as unchanging elements, neglecting their contemporary use and the implications of development on their surroundings. This misrepresentation leads to an incomplete understanding of cultural impacts, failing to acknowledge the cemeteries' role within the life of the community.

Additionally, the application neglects to evaluate intangible cultural heritage, such as the Gaelic language, traditions, and the longstanding relationship between the community and its coastal environment. These aspects are vital to the area's identity and are conspicuously absent from the assessment, representing a critical omission.

Consequently, the true cultural ramifications of the development cannot be accurately assessed without addressing these factors.

Concerns also arise regarding community rights and participation. The Gaelic-speaking community, which possesses a unique cultural identity akin to that of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. This lack of genuine engagement calls into question the validity of the assessment and fails to adhere to established principles regarding participation in decisions impacting cultural and environmental interests.

Moreover, the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018, represents a significant procedural lapse. Without this assessment, the competent authority cannot fulfil its statutory obligation to evaluate the social, cultural, and economic consequences for the island community, thereby hindering a lawful determination.

From a policy standpoint, these inadequacies place the proposed development at odds with National Planning Framework 4, particularly concerning the preservation of historic sites and assets. The failure to consider both tangible and intangible heritage, along with a disregard for living cultural practices, constitutes a clear deviation from policy directives.

In summary, the neglect to assess living heritage, intangible cultural values, community rights, and adherence to statutory requirements creates a substantial evidential gap. The cultural impacts of the proposed development remain inadequately evaluated, and the application does not furnish a robust basis for understanding the true cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a profound sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would lead to a continuous and overwhelming industrial presence, which would fundamentally change this character and result in a permanent and irreversible alteration of the landscape. The assessment of the seascape, landscape, and visual impacts associated with this proposal is materially deficient, failing to adequately represent the extent of this visual change.

The scale and proximity of the turbines are such that they would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would directly impact visual amenity and diminish the essential qualities of naturalness and remoteness. However, the application 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 selecting and presenting visual viewpoints. There is evidence suggesting that these viewpoints may not fully reflect the most sensitive receptors or worst-case scenarios, particularly with respect to key

cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been understated, consequently undermining the reliability of the assessment.

Moreover, the assessment fails to consider the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape that is visually and spatially linked to the Atlantic horizon. Rather than recognising their interdependence, the assessment treats these as isolated assets, resulting in 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 constitutes not only a visual impact but also a broader cultural and spatial harm that has not been sufficiently addressed in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The anticipated scale of change contradicts the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further calls into question any assertion of compliance with policy requirements.

Additionally, it is evident that the impacts identified are not amenable to effective mitigation. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable, leading to changes that are fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation efforts.

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 for the proposed construction raises significant concerns due to its incomplete assessment of construction and pollution risks. Substantial seabed preparation and installation works are planned within a high-energy Atlantic environment, yet there is a notable absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures to be devised after consent, which hinders a thorough evaluation of their adequacy or effectiveness.

Particularly alarming is the reliance on undefined future measures, especially given the delicate nature 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 recognises risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide adequate detail on prevention, control, or monitoring strategies.

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

Compounding these issues is the lack of detailed emergency response procedures, which raises additional concerns. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether appropriate safeguards are in place to address pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the critical determination stage.

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

In summary, the lack of defined mitigation measures, insufficient management plans, and uncertainty surrounding potential impacts result in a materially deficient assessment. These failures impede a comprehensive evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of the application is fundamentally inadequate, particularly concerning the impacts on marine life and the local fishing industry. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application fails to adequately ensure that these essential habitats and industries will be protected from significant disruption.

A major concern is the erroneous assumption that fishing activities can be displaced without repercussions. The application does not provide any evidence to suggest that alternative fishing grounds exist or are capable of accommodating the displaced activities without incurring additional pressures. This lack of information is critical, as such displacement could lead to overfishing in other areas, thereby threatening the livelihoods of local fishers and the local economy. Without a thorough, evidence-based assessment, the effects on fisheries and the communities reliant on them remain poorly understood.

Additionally, the proposal poses notable threats to marine species, particularly due to the underwater noise associated with construction activities. The anticipated use of high-energy hammer piling for extended periods is likely to cause widespread disturbance, particularly affecting species such as dolphins. The potential impact on a significant portion of the local bottlenose dolphin population is of considerable concern, yet the application minimises these risks without sufficient evidence to support its conclusions.

There is also an evident contradiction within the application, where the necessity for licences to permit harm to European Protected Species is acknowledged, while simultaneously classifying the impacts as negligible. This inconsistency undermines the overall credibility of the assessment and raises serious questions about adherence to the Habitats Regulations, especially when harm is indicated to a degree that would require legal permissions.

Furthermore, the assessment neglects to address cumulative impacts resulting from various pressures, including habitat disruption, noise pollution, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential to determine the overall consequences for marine ecosystems and local socio-economic conditions.

From a policy perspective, 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 mitigate unacceptable impacts on marine biodiversity, which precludes any assertion that the proposal embodies sustainable development.

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions all contribute to an incomplete and unreliable assessment. These shortcomings hinder a thorough evaluation of the potential impacts on both marine life and fisheries.

TOURISM

The examination of tourism impacts within the application is severely lacking, failing to adequately address the economic and social implications for a crucial sector of the Isle of Lewis economy. The dependency of tourism on the region's natural attributes, such as its wild coastline, near-pristine landscapes, dark skies, and sense of remoteness, is significant. Notably, while the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide a quantified analysis regarding how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contributions of the sector.

Furthermore, tourism in the area has experienced marked growth, rising from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and constituting up to 16% of the island's economy. However, the application fails to model the potential impacts of seascape industrialisation and environmental degradation on

the Tourism Gross Value Added and the broader economic resilience of the community. The absence of this critical analysis means that it remains unclear whether the development would provide a net economic benefit or detract from an established and expanding industry.

The assessment notably neglects to consider how environmental quality underpins tourism, particularly the significance of unspoiled landscapes and dark skies for visitor experiences and emerging sectors such as nature-based tourism and astro-tourism. Additionally, the lack of a Dark Skies Assessment exacerbates this deficiency, leaving a considerable gap in the understanding of impacts on an acknowledged and burgeoning segment of the local economy.

The implications of the inadequate assessment extend beyond tourism alone, especially in an island community characterised by limited economic diversification. The oversight regarding tourism impacts carries broader ramifications 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 properly evaluated as mandated by the Islands (Scotland) Act 2018.

From a regulatory standpoint, the application does not sufficiently demonstrate adherence to the National Planning Framework 4, especially concerning economic impacts and the requisite demonstration of net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, lacking the necessary evidence for the competent authority to evaluate the economic repercussions of the proposal adequately.

In summary, the cumulative effect of not quantifying tourism impacts, neglecting to assess the environmental factors influencing visitor behaviour, and overlooking the island's economic dependencies culminates in a substantial evidential gap. This inadequacy obstructs a comprehensive evaluation of the economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as outlined by statutory duties and national policy. This application presents issues similar to those that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Despite being submitted under a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application lacks the necessary evidential basis for determination.

Significant gaps in baseline data are present, and the application utilises an undefined design envelope. It relies on unspecified mitigation measures and omits critical impact pathways, including those related to nocturnal wildlife, comprehensive onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is

incomplete, failing to provide a full understanding of the likely significant effects or residual impacts.

Procedural shortcomings are evident, particularly with the absence of a compliant Island Communities Impact Assessment, which breaches the statutory duty established under the Islands (Scotland) Act 2018. The failure to present a complete Social Impact Assessment is also a material omission. These deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

Moreover, the proposal contradicts National Planning Framework 4, as it does not adequately protect biodiversity, natural places, and cultural heritage. It fails to demonstrate acceptable health and wellbeing impacts and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been sufficiently assessed, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks posed by the project are uncertain and potentially significant. The assessments concerning 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, thereby invoking the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

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, and the disruption of cultural and visual relationships would result in permanent effects on tourism that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, impede a lawful, evidence-based decision. Therefore, it is essential that the competent authority refuse consent for the Spiorad na Mara Offshore Wind Farm application in its entirety or require the submission of the outstanding information.

Additional Comments

My father is buried at Dalmore. When I go there, the peace I get from looking out to sea, the emptiness, the stillness, the occasional ship in the distance; helps me to focus on life & our tiny place in this vast world. To look out from the beach & see a wind farm would completely spoil that thought-process. It wouldn’t give me space for my thoughts. I would feel claustrophobic. Our wedding pictures were taken there, only days after the oil-rig which was stranded ashore there (August 2016) had been taken away. We joked that having it there would be a snapshot in time. It was a joke only. Our wedding photos would’ve had to have been photoshopped to remove it. Same goes for

a wind farm in the background. We have a natural landscape, a beautiful landscape around us. Don’t ruin it. We’re so fortunate to have 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: 69ACD92C

Member of the public 924

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The proposal is located off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline and strong cultural identity. The scale and proximity of the project, along with its design, raise immediate and significant concerns about its compliance with statutory requirements, national policy, and sustainable development principles.

Critical deficiencies in the documentation undermine the possibility of a lawful determination. The application lacks an adequate evidential basis, with critical environmental data missing and baseline information being limited and inconsistent. Furthermore, key aspects of the proposal remain undefined, and the use of a flexible design framework obstructs a clear understanding of likely significant effects. Additionally, the reliance on unspecified mitigation measures means that their effectiveness cannot be properly assessed. Consequently, the documentation fails to provide a full or informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects are unsupported by robust evidence.

There are clear policy conflicts that further challenge the application. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, cultural heritage, and health and wellbeing. The proposal does not demonstrate that national requirements for protecting biodiversity and environmental integrity can be satisfied. These conflicts directly affect the statutory tests needed for consent and compromise the authority's capacity to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposal raises serious issues concerning landscape capacity, visual dominance, and environmental impact, especially with large turbines positioned closely 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 unable to support a lawful determination. Under these circumstances, the precautionary principle must apply.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is unreliable and incomplete. It does not provide a full or transparent account of the likely environmental effects of the proposal. The application relies on a flexible Project Design Envelope, which does not commit to specific turbine dimensions or layouts. This introduces significant uncertainty and

prevents a consistent worst-case scenario application. As a result, the impacts presented may not accurately reflect the development that is ultimately constructed. This lack of clarity stops both the public and the competent authority from understanding the true extent of environmental effects.

Moreover, the application depends heavily on mitigation measures, monitoring strategies, and management plans that are yet to be defined. Seeking consent on the basis that environmental harm will be addressed at a later stage makes it impossible to meaningfully evaluate effectiveness or assess residual impacts. This deferral of key information to post-consent stages is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which demands that significant effects and mitigation are established before determination.

There are also serious evidential deficiencies, such as gaps in baseline data, limitations in methodology, and a reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

Consequently, the application does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This raises concerns about the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal fails to demonstrate compliance with National Planning Framework 4, including requirements for biodiversity protection and environmental integrity, as it cannot be shown that impacts have been fully assessed or that appropriate safeguards are in place.

Overall, the reliance on an undefined design envelope, absence of specified mitigation, and gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies prevent a lawful and robust assessment of environmental effects, meaning the competent authority is not able to 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, 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 West Lewis coastal environment is a highly sensitive and biologically active marine system. However, the assessment of marine ecology and protected species is materially deficient, failing to provide a complete or reliable understanding of the ecological receptors present. The baseline data is incomplete, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of the species in this area. Consequently, the assessment does not offer a sound evidential basis for evaluating potential impacts.

A significant oversight in the application pertains to otters, which are a European Protected Species. The failure to properly recognise and assess their active use of coastal areas for foraging and movement is troubling. Without considering their core foraging range and behavioural patterns, the potential effects of construction disturbance, noise, and increased activity have not been adequately evaluated. This lack of assessment undermines any conclusions regarding the absence of significant effects on otters.

Further shortcomings are evident in the assessment of basking sharks, where reliance

on aerial surveys has led to significant detection bias, particularly in Atlantic conditions. This method is likely to underestimate their presence, especially when contrasted with established land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider such important data results in an incomplete baseline, thereby weakening the reliability of the conclusions drawn.

These methodological deficiencies mean that any conclusions regarding negligible or non-significant effects rely on assumptions rather than solid evidence. The inadequacy of baseline data also hinders meaningful assessment of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual scale of risk to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application for development presents a concerning lack of reliability stemming from its ornithological assessment, which contains significant gaps and inconsistencies. The assessment fails to provide adequate evidence 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. Key foraging areas and migratory pathways crucial to these species have not been sufficiently evaluated regarding the risks of displacement, collision, or habitat loss.

Moreover, a fundamental contradiction arises within the application; the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, typically required only in anticipation of significant harm. This inconsistency raises serious doubts about the credibility of the assessment and suggests that its conclusions are not substantiated by the available evidence.

The assessment's failure to address the importance of protected sites, such as the Lewis Peatlands and St Kilda, further highlights its deficiencies. The reliance on modelling approaches introduces considerable uncertainty, especially regarding species facing severe decline, like Kittiwakes and Fulmars. Methodologies used may

underestimate mortality rates, particularly when baseline data is lacking and behavioural responses remain poorly understood.

The siting of turbines within a recognised migratory corridor poses a further significant risk, creating a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor have not been adequately assessed, nor has the potential impact on species with limited global populations.

From a regulatory standpoint, the application does not fulfil the evidential threshold necessary to affirm that there will be no adverse effects on the integrity of protected sites. The combination of contradictory conclusions, data deficiencies, and limitations in modelling means the standard of beyond reasonable scientific doubt has not been met. This raises the necessity to apply the precautionary principle, which inhibits a lawful conclusion in favour of consent.

Overall, the assessment is characterised by internal inconsistencies, methodological shortcomings, and a lack of sufficient evidence. These factors hinder a thorough evaluation of the potential impacts and collectively indicate that the application does not satisfy the statutory requirements essential for determination. Furthermore, the identified deficiencies are inconsistent with the National Planning Framework 4's stipulations on biodiversity protection and the safeguarding of natural assets. The proposal's inability to demonstrate that it will not adversely affect internationally significant seabird populations places it in direct opposition to national policy.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is insufficient and does not recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. The assessment takes a simplistic view, treating heritage as isolated and unchanging assets rather than recognising their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial sites and places of spiritual significance, but the assessment categorises them as static features, overlooking their continued use and the implications of development on their surroundings. This misrepresentation leads to an incomplete understanding of cultural effects and ignores their importance in community life.

Moreover, the assessment neglects intangible cultural heritage, including the Gaelic language, traditions, and the longstanding bond between the community and the coastal environment. These aspects are essential to the identity of the area but are not addressed, representing a major oversight. Without acknowledging these elements, the cultural impact of the development cannot be fully grasped.

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

population has a unique cultural identity and is recognised as an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement compromises the validity of the assessment and does not align with established principles of involvement in decisions that affect cultural and environmental interests.

A vital procedural error is the failure to provide a compliant Island Communities Impact Assessment, which is required by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, especially concerning the safeguarding of historic sites and areas. The disregard for both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, constitutes a clear violation of policy requirements.

In summary, the lack of assessment regarding living heritage, intangible cultural value, community rights, and legal obligations creates a substantial evidential gap. The cultural consequences of the development have not been adequately evaluated, and the application does not offer a solid foundation for assessing the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment concerning social impacts, health, and wellbeing is fundamentally flawed and lacks the necessary transparency for a valid evaluation. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the complete report remains unpublished. This lack of disclosure creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full range of social risks identified by the developer's research.

Available summaries reveal that residents are currently facing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These effects stem from direct engagement, making them concrete rather than speculative. Nevertheless, the failure to release the full assessment limits scrutiny of these findings and restricts the ability to evaluate their importance within the decision-making framework.

Moreover, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Despite these concerns, they have not been adequately integrated into the main application or assigned appropriate significance. The withholding of the full Social Impact Assessment thus obscures the genuine 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, particularly when community character and functioning are at stake. By not providing the complete dataset, the application fails to establish a comprehensive evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments must promote positive health outcomes and mitigate harm, yet the evidence available indicates current adverse effects that remain inadequately disclosed. Without the full assessment, compliance with this policy cannot be substantiated.

The procedural ramifications are considerable. The competent authority is unable to perform a robust socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a material shortcoming within the application and a failure to satisfy the evidential requirements set forth by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the assessment insufficient and unreliable. This prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts and the interconnectedness of landscape and cultural heritage is significantly lacking and does not sufficiently consider the sensitivity of the receiving environment. The proposed large-scale turbines near the West Lewis coastline would introduce a continuous industrial presence that would fundamentally alter the area’s undeveloped character and open Atlantic horizon. This change would result in a permanent and irreversible transformation of the landscape.

Moreover, the application inadequately represents the extent of visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the naturalness and sense of remoteness that define this region. The assessment fails to convey the true significance of this impact within the context of such a sensitive landscape.

Concerns also arise regarding the selection and representation of visual viewpoints in the assessment. Evidence indicates that these viewpoints may not accurately reflect the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and high-value landscapes. This oversight poses a risk of underestimating the magnitude of visual impact, which undermines the assessment's reliability.

Additionally, there is a critical failure to evaluate the interconnected relationship

among the landscape, seascape, and cultural heritage. Heritage sites, such as the Calanais Standing Stones and other Scheduled Monuments, are embedded in a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as isolated entities, neglecting their interdependence and resulting in an incomplete understanding of the impacts on their cultural significance and setting.

The proposed industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This issue transcends visual impact, presenting a broader cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, which prioritises the protection of natural places and historic assets. The proposed scale of change is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The absence of a thorough worst-case assessment further calls into question 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 ensure their presence remains dominant and unavoidable. Consequently, the anticipated change is fundamental and permanent, rather than reducible to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately convey the scale of impact, the sensitivity of the environment, and the interrelated nature of landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this valuable landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works within a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete, lacking the necessary detail to evaluate the likely environmental effects. Notably, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans, as the application relies on undefined future mitigation and contingency measures to be prepared after consent. This approach raises serious concerns, particularly given the sensitivity of the West Lewis coastline, which supports clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination.

While the application acknowledges risks associated with sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these incidents will be prevented, controlled, or monitored. Additionally, there is uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological

consequences of these impacts. This uncertainty extends to potential effects on marine species and habitats that have already been identified as sensitive in the wider assessment.

The absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application undermines the competent authority's ability to assess whether sufficient safeguards are in place to respond to pollution events. This introduces procedural risk and raises significant concerns regarding environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation strategies are evaluated prior to consent, and the lack of such information means that a lawful determination cannot be made. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The assessment provided regarding fisheries and marine life lacks thoroughness and fails to deliver a strong evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate that these crucial habitats and uses can be safeguarded or sustained without causing significant disruption.

One primary concern lies in the assumption that fishing activities can be relocated without repercussions. The application lacks evidence to support the availability, accessibility, or capacity of alternative fishing grounds to absorb additional pressure. This omission is crucial, as the potential for displacement raises the risk of overfishing in other areas and could have broader economic ramifications for the local fishing fleet. An evidence-based assessment is essential to fully understand the impacts on fisheries and the livelihoods that depend on them.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling planned over an extended period is expected to disturb marine life over large areas, notably affecting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application tends to downplay the seriousness of these effects, lacking sufficient supporting evidence.

Additionally, there is a striking inconsistency in the application concerning the necessity for licences to permit harm to European Protected Species, even as such impacts are described as negligible. This contradiction undermines the credibility of the assessment and raises substantial concerns regarding adherence to the Habitats Regulations, particularly where harm is expected to occur to a degree that requires legal authorisation.

The assessment also neglects to account for cumulative impacts resulting from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is vital to ascertain the overall impact on marine ecosystems and the socio-economic landscape.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project's onshore infrastructure is fundamentally deficient, failing to recognise the comprehensive impacts resulting from what constitutes a single integrated project. The offshore turbines and the onshore works are closely interconnected; however, their assessment is conducted in isolation. This fragmented approach obscures the overall environmental and socio-economic ramifications.

Included within the onshore works are the installation of cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the establishment of necessary access infrastructure through sensitive landscapes. These activities require excavation across areas of deep peat, particularly in Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, thus inhibiting a complete understanding of the project's total environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application fails to facilitate an accurate assessment of cumulative effects. The Environmental Impact Assessment process stipulates that all elements of a project should be considered collectively. The division of offshore and onshore components results in an incomplete understanding of the combined effects on peatlands, habitats, and communities.

Additionally, the proposal poses 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, nor does it indicate that effective avoidance measures have been implemented. This results in a notable evidential gap concerning biodiversity protection.

Concerns are also raised about the project's carbon balance. Disturbances to peatland can lead to the release of stored carbon, potentially incurring a carbon debt that contradicts the aims of renewable energy development. The application inadequately addresses this matter and fails to confirm that the overall carbon balance remains advantageous.

Furthermore, the routing of infrastructure across active croft land introduces potential conflicts with existing land use and legal rights. The application does not present evidence that the necessary consents or procedures have been initiated, which raises doubts about the project's deliverability and legal compliance.

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

In summary, the disjointed treatment of project components, the lack of a comprehensive assessment, and insufficient evidence regarding environmental and land use impacts render this portion of the application incomplete and unreliable, thus impeding a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The 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 presents a materially deficient assessment of tourism impacts, failing to evaluate the economic and social consequences for a key sector of the Isle of Lewis economy. Tourism is heavily reliant on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. It is acknowledged within the application that 86% of visitors are attracted by scenery; however, there is no quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has experienced significant growth, rising from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. Despite this growth, the application neglects to model the potential impacts of industrialisation of the seascape and the loss of environmental quality on Tourism Gross Value Added or on the wider economic resilience of the community. Without such an analysis, it remains impossible to ascertain whether the proposed development would result in a net economic benefit or undermine an established and expanding sector.

Moreover, the assessment disregards the critical role of environmental quality in supporting tourism, including the significance of unspoiled landscapes and dark skies

for enhancing visitor experience and for emerging markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this deficiency, leaving a notable gap in the understanding of impacts on a recognised and burgeoning part of the local economy.

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

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

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal 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

There’s projects present an unacceptable destruction of habitat, environment, local business and quality of life.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 9E6AFE98

Member of the public 925

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection is grounded in a thorough review of the Environmental Impact Assessment Report and accompanying documentation, revealing significant deficiencies related to planning, environmental considerations, cultural implications, and procedural adherence. The development is set to be located off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine natural environment, and rich cultural heritage. Concerns arise regarding the scale, proximity, and design of the wind farm, which raise fundamental questions about its alignment with statutory requirements, national policy, and the principles underpinning sustainable development.

The application lacks an adequate evidential foundation for a lawful determination. Critical environmental data is absent, baseline information is both limited and inconsistent, and numerous aspects of the proposal are left undefined. The reliance on a flexible design framework obstructs a clear understanding of potential significant effects, and the dependence on unspecified mitigation measures means that their effectiveness remains unassessed. Consequently, the documentation falls short of providing a comprehensive or informed perspective on the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are unsupported by robust evidence.

Moreover, there are evident and substantive policy inconsistencies. The proposal appears to conflict with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. It fails to establish that national obligations to safeguard biodiversity, climate interests, and environmental integrity can be fulfilled. These inconsistencies directly challenge the statutory tests necessary for consent and jeopardise the ability of the relevant authority to determine that the development aligns with policy criteria.

The scale of the project is unprecedented for this area, with large turbines to be located in close proximity to the shoreline, which raises substantial concerns regarding landscape capacity, visual impact, and environmental ramifications. Collectively, the lack of adequate information, the reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant shortcomings, resulting in an inadequate and opaque account of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This lack of precision hinders the ability to consistently apply a worst-case scenario and diminishes the reliability of the assessment. Consequently, the impacts outlined may not accurately represent the actual development, leaving both the public and the competent authority unable to fully comprehend the true extent of environmental effects.

Additionally, the application's heavy reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans leads to consent being sought on the premise that environmental harm will be addressed after approval. This deferral of essential information to post-consent stages is unacceptable from a procedural standpoint and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

Moreover, there are notable evidential shortcomings, including gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Such deficiencies introduce uncertainty about the scale and significance of impacts, especially where claims of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that fails to meet statutory requirements.

As a result, the application does not satisfy the evidential standards established under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not comply with National Planning Framework 4, as it cannot demonstrate that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, unspecified mitigation measures, and data gaps renders the Environmental Impact Assessment Report incomplete and unreliable. These deficiencies inhibit a lawful and thorough evaluation of environmental effects, preventing the competent authority from making an informed decision based on the available information.

ASSESSMENT OF ALTERNATIVES

The application significantly lacks a proper assessment of alternatives, which fails to meet the necessary standards outlined in the Environmental Impact Assessment regime. Instead of offering a coherent, evidence-based comparison of viable options based on their environmental consequences, it presents merely a narrative of how the project has evolved. This narrative does not adequately prove that less harmful alternatives have been identified, assessed, and prioritised over more damaging

choices.

Moreover, there is an absence of clear and evidence-based comparisons regarding alternative offshore sites, development scales, or design configurations. Specifically, the application does not reflect that the developer has adequately considered the potential for placing turbines further offshore, where there would likely be less visual, ecological, and coastal impact. The West Lewis coastline's sensitivity and the significance of proximity to shore in evaluating impacts mean that without such analysis, it is impossible to conclude that the chosen location is indeed the least harmful.

The shortcomings also extend to the evaluation of cable routing and landfall assessments, which lack sufficient evidence that alternative routes have been thoroughly investigated to minimise impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The failure to establish a clear avoidance strategy and the absence of comparative analysis highlight a neglect of design-based mitigation measures, relying instead on mitigation strategies implemented after design.

Consequently, the application does not show that environmental harm has been adequately reduced through careful site selection, layout decisions, and infrastructure routing. This constitutes a failure to adhere to the recognised mitigation hierarchy, leaving the competent authority unable to ascertain whether more appropriate and less harmful alternatives are available. Without a comprehensive alternatives assessment, one cannot conclude that the proposal meets the standards of sustainability or is compliant with policy.

From the perspective of policy compliance, this deficiency undermines adherence to National Planning Framework 4, particularly concerning the safeguarding of natural areas, cultural heritage, and community wellbeing. The lack of a systematic and comparative assessment is a significant omission that ultimately leads to the conclusion that the application has not been sufficiently evaluated and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species is fundamentally flawed, lacking a complete understanding of the ecological receptors present within the West Lewis coastal environment. This region is recognised for its biological activity and sensitivity; however, the baseline data remains incomplete, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of species. Consequently, the assessment fails to establish a reliable evidential basis for evaluating potential impacts.

A significant oversight is the treatment of otters, classified as a European Protected Species. The application neglects to adequately identify and assess their use of coastal regions for foraging and movement. By failing to take into account their core foraging

range and behavioural habits, the assessment inadequately evaluates the potential effects of construction disturbance, noise, and increased activity on these animals. This shortfall undermines the conclusions drawn regarding the absence of significant effects on otters.

Moreover, the assessment of basking sharks demonstrates further shortcomings, particularly due to an overreliance on aerial surveys that introduce a considerable detection bias, especially under Atlantic conditions. This method likely underestimates the presence of basking sharks when compared to established land-based observations that indicate their frequent use of the area. The omission of this relevant data results in a deficient baseline, thereby compromising the reliability of the conclusions reached.

These methodological flaws lead to conclusions about negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data also obstructs a meaningful assessment of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty generated by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, 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 results in an unreliable assessment. These shortcomings hinder a robust evaluation of impacts on marine ecology and protected species, ultimately illustrating that the application does not rest on a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamentally flawed ornithological assessment, characterised by significant gaps in evidence and internal contradictions that seriously undermine its conclusions. The proposed development is situated within critical 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. The applicant fails to demonstrate, to the required evidential standard, that these species will not face adverse impacts.

The assessment exhibits a critical inconsistency; the developer claims there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This contradiction raises serious doubts about the assessment's reliability and suggests that the conclusions drawn are not underpinned by robust evidence.

Moreover, the assessment lacks sufficient evidence regarding seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, ensuring their protection from adverse effects remains unproven. The importance of these feeding grounds is inadequately addressed, and the reliance on modelling introduces a level of uncertainty, particularly for species like Kittiwakes and Fulmars, which are in severe decline. The methodologies employed risk underestimating mortality, especially in light of incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor further exacerbates this situation, as it creates a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of ongoing mortality in this corridor, nor does it consider the potential effects on species with relatively small global populations.

Regulatory concerns arise as the application fails to meet the evidential threshold needed to assert there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, combined with data gaps and the limitations of modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This raises the precautionary principle, which precludes a lawful conclusion in favour of consent.

Additionally, the deficiencies noted demonstrate a lack of compliance with National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to confirm that internationally important seabird populations will remain unaffected places the proposal at odds with national policy.

In summary, the assessment is deemed unreliable due to its internal inconsistencies, methodological shortcomings, and insufficient evidence. These flaws hinder a thorough evaluation of impacts and lead to the conclusion that the application fails to meet the statutory requirements for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is seriously lacking and does not acknowledge the West Lewis coastline as a vibrant cultural landscape where environment, tradition, language, and community are deeply intertwined. The application takes a narrow view, treating heritage as disconnected, unchanging assets instead of recognising their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is how culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas are handled. These sites serve as active burial places and spiritual locations, yet the assessment treats them as fixed features, overlooking their current use, significance, and the potential impact of development on their surroundings. This misrepresentation leads to an incomplete assessment of cultural effects and fails to acknowledge their importance in community life.

The assessment also neglects to consider intangible cultural heritage elements, such as the Gaelic language and local traditions, as well as the enduring connection between the community and the coastal environment. These aspects are crucial to the area's identity but are entirely omitted from the evaluation, representing a major gap. Without addressing these factors, the true cultural impact of the development cannot be adequately grasped.

There are additional concerns regarding community rights and involvement. The Gaelic-speaking population has a unique cultural identity, recognised as characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and does not adhere to established principles of involvement in decisions that affect cultural and environmental matters.

A significant procedural error is the failure to conduct a compliant Island Communities Impact Assessment, which is required by the Islands (Scotland) Act 2018. Without this assessment, the relevant authority is unable to meet its legal obligations to evaluate the social, cultural, and economic effects on the island community. This absence alone makes lawful determination impossible.

From a policy standpoint, these shortcomings put the proposal at odds with National Planning Framework 4, especially regarding the protection of historic assets and places. The oversight of both tangible and intangible heritage, along with the failure to recognise living cultural practices, is a clear deviation from policy expectations.

In summary, the neglect of living heritage, intangible cultural values, community rights, and statutory requirements results in a significant evidential gap. The cultural impacts of the development have not been properly assessed, and the application fails to provide an adequate foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and its undeveloped nature, evoking a strong sense of remoteness. The assessment of seascape, landscape, and visual impacts in the application is materially deficient, failing to adequately represent the scale of change or the sensitivity of this unique environment. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence that would fundamentally alter this character, resulting in a permanent and irreversible transformation of the landscape.

The application does not fully capture the magnitude of the visual change. The scale and proximity of the turbines mean they would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. The assessment inadequately conveys this level of impact and its significance within such a sensitive landscape.

Methodological issues are evident regarding 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 risk of understatement undermines the reliability of the visual impact assessment.

A significant oversight is the failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Iconic sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. Instead of recognising their interdependence, the assessment treats these assets in isolation, resulting in an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these crucial relationships, changing the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This represents not only a visual impact but also a broader cultural and spatial harm that has not been adequately assessed in the application.

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

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

In summary, the assessment fails to accurately represent the extent 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 valuable landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks sufficient detail concerning construction and pollution risks, rendering the assessment materially deficient. It involves significant seabed preparation and installation works within a high-energy Atlantic environment, yet fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that would be devised post-consent. This reliance on undefined future measures raises serious concerns, particularly given the sensitivity of the receiving environment, which includes the West Lewis coastline that is home to clean coastal waters and important habitats vulnerable to sediment disturbance and contamination.

While the application does acknowledge risks such as sediment mobilisation and accidental chemical or oil spills, it does not adequately detail the strategies for preventing, controlling, or monitoring these risks. Moreover, there exists uncertainty regarding the scale and behaviour of sediment plumes that may arise from seabed disturbance and cable installation. The absence of robust modelling and clearly defined management strategies leaves unanswered questions about the extent, duration, and ecological impacts of these disturbances. This uncertainty also extends to potential effects on marine species and habitats, which 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 inhibits the assessment of whether suitable safeguards are established to address pollution events. This creates procedural risks and undermines the competent authority's ability to evaluate 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 strategies must be assessed prior to granting consent, and the absence of this information prevents a lawful determination. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality. Collectively, these deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is fundamentally incomplete.

FISHERIES AND MARINE LIFE

The application under review lacks a thorough assessment of fisheries and marine life, failing to provide a robust evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the proposal does not sufficiently demonstrate how these important uses and habitats can be protected or maintained without substantial disruption.

A significant concern within the application is the assumption that fishing activities can be displaced without any consequences. There is no evidence presented to indicate that alternative fishing grounds are available, accessible, or capable of sustaining any increased pressure from displaced activities. This critical omission poses a risk of overfishing in other areas, which could have broader economic implications for the local fishing fleet. Without a clear and evidence-based evaluation, the potential impacts on fisheries and local livelihoods remain poorly understood.

Moreover, the proposal presents considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The use of high-energy hammer piling for extended periods is likely to cause disturbances over large distances, negatively affecting species such as dolphins. The anticipated disruption to

a significant portion of the local bottlenose dolphin population raises serious concerns; yet, the application appears to downplay these potential effects without sufficient supporting evidence.

There exists a notable inconsistency in the application regarding the necessity for licenses to permit harm to European Protected Species, while simultaneously describing the impacts as negligible. This contradiction undermines the credibility of the assessment and raises issues concerning compliance with the Habitats Regulations, particularly when harm is anticipated to a degree that warrants legal authorisation.

Additionally, the assessment fails to take into account the cumulative impacts that arise from multiple pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. Absent 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 adequately 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 that it can avoid unacceptable impacts on marine biodiversity. This lack of demonstration prevents 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 the internal inconsistencies within the application all contribute to an incomplete and unreliable assessment. Such shortcomings hinder a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application lacks a thorough assessment of onshore infrastructure, which is crucial given that the offshore turbines and onshore works are interconnected. By evaluating these components separately, the true scale of environmental and socio-economic impacts is obscured, leading to a fragmented understanding of the project's overall footprint.

Onshore works involve significant undertakings such as cabling across protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. These activities will require excavation through areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. The current application fails to deliver a comprehensive evaluation of these impacts, which hinders an accurate understanding of the environmental consequences.

By neglecting to assess onshore impacts, the application prevents a proper evaluation

of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the disjointed assessment means that the combined impacts on peatlands, habitats, and local communities remain poorly understood.

There are notable risks to sensitive habitats, including machair systems and peatland environments that are under policy protection. The application does not convincingly show that the impacts on these habitats have been fully examined or that suitable avoidance measures have been implemented. This creates a significant evidential gap regarding biodiversity protection.

Concerns also arise regarding carbon balance, as disturbance of peatland could release stored carbon, potentially leading to a carbon debt that undermines the goals of renewable energy development. The application does not sufficiently address this critical issue or prove that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is a lack of evidence that necessary consents or processes have been initiated, raising doubts about deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of any assessment regarding dark skies and nocturnal wildlife in the Environmental Impact Assessment represents a significant oversight. The West Lewis coastline is noted for its exceptionally dark skies, which play a vital role in shaping the area's environmental quality, cultural identity, and tourism value. The proposed development would introduce permanent red aviation lighting that is visible over extensive distances, resulting in a continuous and intrusive “wall of light” effect across the western horizon. This would drastically change the night-time environment.

Furthermore, the application neglects to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning given the significance of dark skies to the local identity and the growing tourism sectors, such as astro-tourism. The failure to address these impacts signifies a clear gap in the overall assessment of landscape and environmental factors.

Most importantly, there is no analysis of the potential effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial lighting, which can lead to disorientation and increased collision risk. The application lacks any lighting impact assessment or phototaxis study, thereby failing to evaluate how the proposed aviation lighting could affect these species or contribute to increased mortality rates.

This gap is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which does not adequately capture nocturnal behaviour or the associated risks. Kittiwakes, for instance, may forage or migrate at night and could be similarly affected by disorientation from artificial lighting. The absence of site-specific night-time data creates a critical void in understanding ecological impacts.

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

From a policy standpoint, this omission contradicts National Planning Framework 4 regarding the protection of natural places and the quality of the environment. Moreover, it undermines a broader assessment of landscape and seascape impacts, as the character of night-time environments is integral to overall environmental quality.

Overall, the lack of assessment concerning dark skies and nocturnal wildlife constitutes a considerable evidential gap. The omission of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of substantiating a lawful determination.

TOURISM

Tourism on the Isle of Lewis has seen 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. However, the application does not assess how the proposed large-scale offshore infrastructure could impact tourism, particularly in terms of visitor numbers and economic contributions. It is essential to understand that tourism relies heavily on the area's wild coastline, unspoiled landscapes, dark skies, and a sense of remoteness. Although the application notes that 86% of visitors are attracted by scenery, it fails to provide a quantified analysis of the potential effects on this key sector.

The assessment overlooks the importance of environmental quality for tourism. Unspoiled landscapes and dark skies are vital to visitor experiences, particularly for emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further highlights this shortcoming, creating a notable gap in understanding the potential impact on this growing part of the local economy.

In an island community with limited economic diversification, the neglect to assess tourism impacts has broader implications for employment, local businesses, and community sustainability. Additionally, the lack of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been evaluated as required 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 obligation to show net benefit. It also conflicts with strategic objectives that prioritise tourism as a growth sector, and fails to provide sufficient evidence for the competent authority to assess the economic consequences of the proposal.

In summary, the failure to quantify tourism impacts, evaluate environmental factors affecting visitor behaviour, and address the island's economic dependency leads to a significant evidential gap. This gap prevents a thorough evaluation of economic effects and contributes to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the criteria for sustainable development as mandated by statutory obligations, national policies, and evidential standards. This application mirrors the fundamental issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not adequately address these critical areas.

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

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

The proposal stands in direct contradiction to the National Planning Framework 4. It does not demonstrate sufficient protection for biodiversity, natural landscapes, and

cultural heritage. Additionally, it fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. Moreover, the cumulative impacts of both offshore and onshore components have not been properly evaluated, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

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

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

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

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

Additional Comments

We visit Isle of Lewis frequently to visit family. These wind turbines that will not benefit the island residents and provide not only an absolute eye sore being so close to land the implications caused by the sound and light pollution will absolutely ruin the tranquility that is sought after when leaving cities. No northern lights, no star gazing. No peaceful watching the waves crash against the rocks and clearing your head for your mental state.
Other than that the fact that the energy generated will not be benefited from the islanders is outrageous. The marine life will suffer massively. We once watched a a school of whales passing which absolutely would never happen again
You are treating residents like Guinea pigs.
Local businesses will suffer with tourism affected

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: 0E0DA4FC

Member of the public 926

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. The objection arises from an examination of the Environmental Impact Assessment Report and related documents, highlighting significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. Concerns have been raised regarding the proposal's scale, proximity, and design in relation to compliance with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a legal determination. There is missing critical environmental data, while the baseline information provided is both limited and inconsistent, with important elements of the proposal remaining undefined. The application employs a flexible design framework, which obscures the understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures hampers any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, rendering the assertions of negligible or non-significant effects unsubstantiated by solid evidence.

There are evident and significant conflicts with established policies. The proposal is at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural areas, cultural heritage, and health and wellbeing. It does not convincingly demonstrate adherence to national requirements for protecting biodiversity, climate considerations, and environmental integrity. These discrepancies directly affect the statutory tests necessary for obtaining consent and challenge the capacity of the relevant authority to ascertain the development's acceptability in policy terms.

The unprecedented scale of the proposal, with large turbines planned in close proximity to the shoreline, raises major issues regarding landscape capacity, visual impact, and overall environmental consequences. In summary, the lack of adequate information, the dependence on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these factors, it is essential to apply the precautionary principle.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The proposal fundamentally lacks the evidential support necessary for thorough assessment under the Habitats Regulations. This raises concerns about potential adverse effects on protected species and sensitive habitats, invoking the precautionary principle. The absence of a complete Environmental Impact Assessment Report is alarming, as it does not provide a full, transparent, or reliable account of the likely environmental effects associated with the development.

There is significant uncertainty stemming from the use of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This ambiguity undermines the integrity of the assessment, as it prevents a consistent application of a worst-case scenario, ultimately obscuring the true extent of environmental effects from both the public and the competent authority.

The application is heavily reliant on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the notion that environmental harm will be addressed later hinders any meaningful evaluation of effectiveness or assessment of residual impacts. This deferment of critical information to post-consent stages is procedurally unacceptable and contradicts the fundamental purpose of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation be established before determination.

Furthermore, the report exhibits significant evidential deficiencies, including gaps in baseline data, limitations in methodology, and an over-reliance on assumptions instead of site-specific evidence. This results in uncertainty regarding the scale and significance of impacts, especially where the conclusions drawn indicate negligible or non-significant effects without robust supporting data. The lack of sufficient information complicates the understanding of cumulative and worst-case impacts, leading to scientific uncertainty that is incompatible with statutory requirements.

Ultimately, the combination of reliance on an undefined design envelope, absence of specified mitigation, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. Such deficiencies obstruct a lawful and robust assessment of environmental effects, leaving the competent authority unable to determine the application based on the provided information. The failure to demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, further emphasizes the critical nature of these oversights.

ASSESSMENT OF ALTERNATIVES

The application lacks a proper assessment of alternatives, failing to meet the requirements set out by the Environmental Impact Assessment regime. It does not provide a clear comparison of realistic alternatives based on their environmental effects. Instead, the application offers a narrative of project development, which does not effectively show that less harmful options have been identified, assessed, and chosen over more damaging solutions.

There is no clear, evidence-based analysis of alternative offshore locations, development scales, or design options. Specifically, the application does not indicate that the developer has genuinely considered placing turbines further offshore, where the potential visual, ecological, and coastal impacts could be reduced. The West Lewis coastline is particularly sensitive, and proximity to shore is crucial in assessing impacts. Thus, the lack of this analysis means that it cannot be concluded that the proposed siting is the least damaging option available.

The shortcomings also apply to cable routing and landfall evaluation. There is inadequate evidence that alternative routes have been thoroughly examined to prevent or lessen impacts on sensitive receptors, including culturally significant sites like Barvas Cemetery. The absence of a clear strategy to avoid these impacts, along with a lack of comparative analysis, suggests that mitigation through design has not been implemented, relying instead on mitigation measures after the design phase.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This oversight constitutes a failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to determine if less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it is impossible to assert that the proposal is sustainable or compliant with policy.

From a policy standpoint, this lack of assessment compromises adherence to National Planning Framework 4, especially regarding the protection of natural areas, cultural heritage, and community wellbeing. The failure to provide a structured and comparative analysis is a significant omission, leading to the conclusion that the application has not been properly evaluated and cannot be lawfully determined.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species associated with the application is fundamentally inadequate, failing to deliver a comprehensive and trustworthy understanding of the ecological receptors within the West Lewis coastal environment. This region constitutes a highly sensitive and biologically rich marine system; however, the baseline data presented is insufficient, and the methodologies employed do not effectively capture the presence, behaviours, and habitat utilisation of various species. Consequently, the assessment lacks a solid evidential basis necessary for evaluating potential impacts.

A significant gap exists concerning otters, which are classified as a European Protected Species. The application does not adequately acknowledge or evaluate their active utilisation of coastal regions for foraging and movement. The disregard for their core foraging range and behavioural patterns means that the potential impacts of construction-related disturbances, noise, and heightened activity remain inadequately assessed. This oversight seriously undermines any conclusions regarding the absence of significant effects on this species.

Further shortcomings are apparent in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. This methodological approach 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 include or appropriately consider such vital data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects that are predicated on assumptions rather than robust evidence. The lack of adequate baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty casts doubt on the actual 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 and National Planning Framework 4, as protected species have not been identified or assessed in a thorough manner. The introduced uncertainties prevent the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these issues, it is clear that consent cannot be granted lawfully.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

A critical contradiction arises within the application; the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency undermines the reliability of the assessment, suggesting that the conclusions drawn lack support from the evidence presented. Furthermore, the assessment does not adequately establish that seabirds associated with protected sites, like the Lewis Peatlands and St Kilda, will be unaffected. It inadequately accounts for the significance of these feeding grounds, and reliance on modelling approaches

injects uncertainty, particularly concerning species experiencing severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to understate mortality, especially where baseline data is lacking and behavioural responses are not fully understood.

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is seriously flawed, neglecting the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts a narrow perspective, viewing heritage merely as a collection of disconnected, static entities instead of recognising their ongoing social, cultural, and spiritual relevance to the community.

The assessment significantly underrepresents culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, which remain active sites for burial and spiritual practices. Instead of acknowledging their ongoing use and significance, the assessment inaccurately categorises them as static features, overlooking how development may impact their surroundings. This mischaracterisation leads to an incomplete understanding of the cultural repercussions and fails to appreciate their importance in community life.

Additionally, there is a striking omission in addressing intangible cultural heritage, which encompasses the Gaelic language, traditional practices, and the long-standing

bond between the community and the coastal environment. These aspects are vital to the area's identity yet are entirely absent from the evaluation, representing a major oversight. Without incorporating these factors, the development's cultural impacts cannot be adequately assessed.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, recognised as having a distinct cultural identity akin to Indigenous Peoples, has not been involved in a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and disregards established principles for participation in decisions affecting cultural and environmental matters.

A significant procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. This omission prevents the competent authority from meeting its legal obligations to assess the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

From a policy standpoint, these shortcomings put the proposal in clear opposition to National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The failure to consider both tangible and intangible heritage and to acknowledge living cultural practices demonstrates a clear deviation from established policy requirements.

In summary, the neglect of living heritage, intangible cultural values, community rights, and compliance with statutory requirements results in a significant gap in evidence. The cultural impacts of the proposed development have not been thoroughly assessed, and the application lacks a sufficient foundation for determining the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises serious concerns regarding social impacts, health, and wellbeing, which remain inadequately assessed and lack the necessary transparency for a lawful evaluation. Although a Social Impact Assessment was commissioned by the developer, including focus groups with local residents, the comprehensive report has not been made publicly available. This lack of access constitutes a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full extent of the social risks identified through the developer's own research.

Reports suggest that local residents are currently facing measurable stress, anxiety, and apprehension due to the scale and proximity of the development proposal. These negative impacts stem from direct engagement with the community and are not mere speculation. Nonetheless, the absence of the full assessment obstructs proper examination of these findings and restricts the capacity to gauge their importance in the decision-making process.

Furthermore, there is evidence indicating that the proposed development is perceived as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Unfortunately, these identified impacts have not been adequately incorporated into the main application nor afforded appropriate consideration. The withholding of the complete Social Impact Assessment thus obscures the genuine human and social costs associated with the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functionality may be at stake. By failing to provide the complete dataset, the application does not present a comprehensive evidential foundation needed for assessing the balance between benefits and detriments.

From a policy standpoint, the application does not show adherence to National Planning Framework 4 concerning health and wellbeing. Developments are mandated to promote positive health outcomes and avert harm, yet the information presently available indicates existing negative effects that remain undisclosed. Without the full assessment, it is impossible to demonstrate compliance with this policy.

The procedural implications arising from this situation are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission represents a material deficiency within the application and constitutes a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the proposal's impact on seascape, landscape, and visual aspects is insufficient and fails to adequately capture the extent of the changes and the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon and an undeveloped nature that conveys a strong sense of remoteness. The addition of large-scale turbines near the shoreline would create a continuous industrial presence that would fundamentally alter this character, leading to a permanent transformation of the landscape.

The proposed turbines would dominate the views from residential areas, historic sites, and popular coastal locations, which would significantly affect visual amenity and detract from the naturalness and remoteness of the environment. The assessment does not effectively communicate the magnitude of this impact or its importance in the context of such a sensitive landscape.

Methodological issues are evident in the selection and presentation of visual viewpoints, as the evidence indicates that these viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This raises concerns that the assessment has understated the visual impact, calling into question its reliability.

Additionally, the relationship between landscape, seascape, and cultural heritage has not been adequately considered. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are interconnected within the broader landscape, linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these heritage assets as isolated, which results in an incomplete understanding of the impact on their context and cultural significance.

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

From a policy standpoint, the proposal directly contradicts National Planning Framework 4, which aims to protect natural areas and historic assets. The scale of the proposed changes is not compatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further questions any claims of compliance with policy.

Moreover, the identified impacts are unlikely to be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be prominent and unavoidable. Consequently, the change is fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation efforts.

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 support the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks a thorough assessment of construction and pollution risks, which is necessary to evaluate environmental effects. Significant works on the seabed will take place in a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included. The application depends on mitigation and contingency measures that are to be developed after consent is granted, hindering any effective evaluation of their adequacy or effectiveness.

This approach raises serious concerns, particularly due to the sensitivity of the environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are at risk of damage from sediment disturbance and contamination. While the application acknowledges risks like sediment mobilisation and accidental spills of chemicals or oil, it does not provide enough detail on how these incidents will be prevented, managed, or monitored.

There is also ambiguity regarding the scale and behaviour of sediment plumes caused by seabed disturbance and cable installation. Without thorough modelling and well-defined management strategies, it is impossible to assess the extent, duration, or ecological impacts of these effects. This uncertainty also relates to potential impacts on marine species and habitats identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures amplifies these issues. By postponing contingency planning to a time after consent, the application makes it difficult to evaluate whether adequate safeguards are in place for responding to pollution incidents. This creates procedural risks and undermines the competent authority's ability to assess environmental protection measures effectively.

From a regulatory standpoint, this postponement of essential environmental safeguards contradicts the requirements set by the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated before consent is granted, and without this information, a lawful decision cannot be made. The application also falls short of demonstrating adherence to policy requirements concerning environmental protection and water quality.

Overall, the lack of clearly defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts render the assessment seriously deficient. These issues prevent a robust evaluation of construction and pollution risks, supporting the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of fisheries and marine life associated with this application is inadequate and does not provide a thorough evaluation of the ecological or socio-economic impacts involved. The waters off the West Lewis coast not only host a diverse marine ecosystem but also support an active fishing industry. However, the application fails to prove that these vital uses and habitats can be protected or maintained without significant disruption.

A major concern arises from the assumption that fishing activity can be displaced without any adverse consequences. There is no evidence provided that alternative fishing grounds exist, are accessible, or can sustain additional pressure. This is a significant oversight, as such displacement could lead to overfishing in other areas and potentially harm the local fishing fleet’s economic viability. Without a sound and evidence-based assessment, the potential impacts on fisheries and livelihoods remain

poorly understood.

Moreover, the proposal poses considerable risks to marine species, primarily due to the underwater noise produced during construction. The prolonged use of high-energy hammer piling is likely to cause disturbances over large distances, affecting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application tends to downplay the seriousness of these effects, lacking sufficient supporting evidence.

There is also a glaring inconsistency within the application itself; it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously describing impacts as negligible. This contradiction calls into question the reliability of the assessment and raises concerns about adherence to the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

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

In conclusion, the absence of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions collectively render the assessment incomplete and unreliable. These shortcomings obstruct a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a thorough assessment of the onshore infrastructure, which is crucial in understanding the full scope of impacts stemming from what constitutes a singular integrated project. The offshore turbines and the onshore components are inherently interconnected; however, their separate evaluations lead to a disjointed analysis that obscures the comprehensive environmental and socio-economic repercussions.

The elements of the onshore works comprise cabling across areas of protected moorland, the construction of a substation in proximity to Stornoway, and the development of access infrastructure traversing sensitive landscapes. These activities entail excavation in regions of deep peat, particularly within Barvas Moor, recognised as a significant carbon reservoir and an ecologically sensitive area. The application lacks a thorough assessment of these impacts, which impedes a complete understanding of

the environmental footprint of the project.

The assessment deficiencies extend to cumulative effects, as the exclusion or postponement of onshore impact evaluations obstructs an accurate appraisal of overall consequences. The Environmental Impact Assessment process mandates that all project components be evaluated collectively; thus, the fragmented analysis of offshore and onshore elements results in an incomplete understanding of the collective impacts on peatlands, habitats, and local communities.

Additionally, there are notable risks associated with sensitive habitats, such as machair systems and peatland environments, which are under policy protection. The application does not sufficiently establish that the impacts on these vital habitats have been fully evaluated or that suitable avoidance measures are in place. This creates a substantial evidential gap in relation to biodiversity protection.

Concerns also arise regarding carbon balance, as disturbance of peatland leads to the release of stored carbon, potentially resulting in a carbon debt that contradicts renewable energy development objectives. The application inadequately addresses this critical issue or demonstrates that the overall carbon balance remains advantageous.

The routing of infrastructure through active croft land further complicates matters, introducing potential conflicts with existing land use and legal rights. The application does not furnish evidence that the requisite consents or processes have been initiated, thereby raising concerns about the project's deliverability and lawful execution.

From a policy standpoint, the division of project assessments and the failure to demonstrate adequate protection for peatlands, habitats, and land use interests conflict with the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated significantly undermines the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife is a substantial gap within the Environmental Impact Assessment. The West Lewis coastline is renowned for its exceptionally dark skies, which play a vital role in the area's environmental quality, cultural identity, and tourism potential. The proposal, which includes the introduction of permanent red aviation lighting, would create an intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

Moreover, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight

is critical, given the significance of dark skies to the community's identity and emerging sectors like astro-tourism. The absence of consideration for these impacts creates a notable deficiency in the overall landscape and environmental assessment.

Additionally, there is no analysis regarding the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and heighten the risk of collisions. The application does not provide any lighting impact assessment or phototaxis study, failing to examine how the proposed aviation lighting may affect these species or lead to increased mortality rates.

The situation is further exacerbated by reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and the associated risks. For example, Kittiwakes, which may forage or migrate during the night, are also susceptible to disorientation from artificial lighting, yet this risk remains unassessed. The absence of specific night-time data signifies a crucial gap in understanding the ecological implications.

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

From a policy standpoint, the absence of this assessment conflicts with National Planning Framework 4 concerning the protection of natural environments and environmental quality. It also diminishes the overall assessment of landscape and seascape impacts since the character of the night-time environment is an integral component of the ecosystem.

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

TOURISM

The application under consideration lacks a thorough assessment of the impacts on tourism, which is a vital sector for the Isle of Lewis economy. It is crucial to note that tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and overall sense of remoteness. Although the application states that 86% of visitors are attracted by scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure may influence visitor numbers, their behaviour, or the overall economic contribution of tourism.

Since 2017, tourism on the island has seen substantial growth, rising from £65 million to over £81.5 million, and it supports more than 1,000 jobs while accounting for as

much as 16% of the island's economy. Nonetheless, the application does not model the potential effects of seascape industrialisation and the degradation of environmental quality on Tourism Gross Value Added or the broader economic resilience of the area. This lack of analysis makes it impossible to ascertain whether the proposed development would yield a net economic benefit or detract from a sector that is both established and expanding.

Furthermore, the assessment neglects to account for the critical role that environmental quality plays in sustaining tourism, particularly the significance of unspoiled landscapes and dark skies to the visitor experience. Emerging markets such as nature-based tourism and astro-tourism highlight the need for a comprehensive understanding of these factors. The absence of a Dark Skies Assessment exacerbates the shortcomings of the application, creating a considerable gap in understanding the potential impacts on this recognised and growing aspect of the local economy.

In an island community that has limited economic diversification, the lack of an assessment of tourism impacts raises broader concerns for employment, local enterprises, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means 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 the National Planning Framework 4, particularly regarding economic impacts and the necessity to show net benefit. It also contradicts strategic objectives that designate tourism as a priority growth sector, while lacking sufficient evidence for the competent authority to effectively assess the economic ramifications of the proposal.

The combination of insufficient quantification of tourism impacts, inadequate consideration of the environmental factors driving visitor behaviour, and a disregard for the island's economic dependency results in a significant evidential gap. This omission undermines the ability to conduct a robust evaluation of the economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. It revisits the same central issues that led to the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. This new proposal is now presented within a policy framework that places greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing, yet still falls short.

A complete and reliable evidential basis for determination is not provided. There are notable gaps in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and the exclusion of crucial impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects. Consequently, the

Environmental Impact Assessment is incomplete, hindering a full understanding of the likely significant effects or residual impacts.

Moreover, clear procedural failures are evident. The lack of a compliant Island Communities Impact Assessment violates statutory obligations under the Islands (Scotland) Act 2018, and the failure to disclose the entire Social Impact Assessment constitutes a serious omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

The proposal directly contradicts National Planning Framework 4. It does not demonstrate protection for biodiversity, natural places, and cultural heritage, fails to establish that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit due to inadequate tourism impact modelling. The cumulative impacts of offshore and onshore elements have not been thoroughly evaluated, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and contain internal inconsistencies. The necessary evidential threshold to eliminate adverse effects beyond reasonable scientific doubt has not been satisfied, thus engaging the precautionary principle and impeding a lawful conclusion that impacts are acceptable.

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

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

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

Additional Comments

The more I have learnt about the plans for this wind farm the more concerned I become.

When I asked questions at the various local 'consultations' I was either greeted again and again with answers of "I'm sorry I don't know" through to patronising absurdities and what seem now to be downright lies.

My husband is a community psychiatric nurse and commutes daily from Ness to

Stornoway on the only road there and back, it will take him even longer once construction starts and in a very difficult job he needs every minute he can get to unwind and de-stress at home.

The noise of construction on land will totally disrupt our lives and at sea will totally disrupt marine life. This is pristine land and we have clearly seen what the wind farms have done to areas like Caithness and Shetland where residents' lives have been shattered.

Tourism is a main income for many living here and it is already being hit by failure of the ferries but adding construction traffic and disruption for the next few years the impact is unthinkable.

A paltry payment to the island of £5 million per year is frankly a massive insult when considering the money to be made daily by just switching off one turbine which has been seen happening all over the mainland.

We have been told that not only can we not buy into the scheme but that our electricity will not be any cheaper either which beggars belief.

I wholeheartedly object to this monstrous scheme.

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: E0C4F94F

Member of the public 927

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the appropriate marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report alongside other supporting documents, revealing significant deficiencies relating to planning, environmental aspects, cultural considerations, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. Concerns are raised regarding the compatibility of the proposal's scale, proximity, and design with existing statutory requirements, national policies, and the tenets of sustainable development.

The application does not furnish an adequate evidential basis necessary for a lawful determination. It lacks critical environmental data, and the baseline information provided is both limited and inconsistent, with several key elements of the proposal remaining undefined. The application's use of a flexible design framework obfuscates the potential significant effects, while the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining the claims of negligible or non-significant effects due to a lack of robust supporting evidence.

There exist clear and significant conflicts with policy. The proposal shows inconsistencies with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not establish that the national requirements for safeguarding biodiversity, climate interests, and environmental integrity will be fulfilled. These discrepancies directly challenge the statutory tests necessary for consent, thereby compromising the ability of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal introduces large turbines situated in close proximity to the shoreline, which raises substantial concerns regarding the landscape capacity, visual dominance, and environmental impact. Collectively, the insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance illustrate that the application is incomplete and cannot sustain a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not deliver a full, transparent, or dependable account of the potential environmental effects associated with the proposal. The flexible Project Design Envelope employed in the application, which does not commit to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This uncertainty obstructs the consistent application of a worst-case scenario, thereby undermining the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development that will ultimately be constructed, hindering both public understanding and that of the competent authority regarding the true extent of the environmental effects.

Furthermore, the application is predominantly dependent on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent on the premise that environmental harm will be addressed at a later stage obstructs any substantial evaluation of the effectiveness of these measures or assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable, contradicting the intent of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before determination.

Additionally, there are significant evidential gaps, including deficiencies in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the magnitude and significance of impacts, especially in cases where negligible or non-significant effects are presented without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that cannot be aligned with statutory requirements.

As a result, the application does not meet the evidential threshold stipulated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also fails to demonstrate adherence to National Planning Framework 4, including stipulations regarding biodiversity protection and environmental integrity, as it remains unclear whether impacts have been thoroughly assessed or appropriate safeguards implemented.

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

ASSESSMENT OF ALTERNATIVES

The proposal under review suffers from a fundamentally inadequate assessment of alternatives, failing to satisfy the requirements set forth by the Environmental Impact Assessment regime. Instead of offering a systematic and reasoned evaluation of viable

alternatives based on their environmental impacts, the application merely recounts the project's development history. This narrative approach does not convincingly establish that less harmful options have been appropriately identified, assessed, and chosen over more detrimental solutions.

There is a noticeable lack of transparent and evidence-based comparisons concerning alternative offshore locations, varying development scales, or different design configurations. Notably, the application does not indicate that the developer has genuinely considered positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be minimised. The sensitivity of the West Lewis coastline, along with the critical importance of proximity to the shore in evaluating impacts, renders the absence of such analysis a significant oversight. This gap prevents any assertion that the proposed location is indeed the least damaging option available.

Furthermore, shortcomings extend to the evaluation of cable routing and landfall locations. There is insufficient evidence indicating that alternative routes have been diligently examined to avoid or lessen impacts on sensitive areas. This includes places of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy to avoid these impacts, coupled with an absence of comparative analysis, suggests that the design mitigation has not been effectively implemented, relying instead on mitigation measures that are only proposed post-design.

Consequently, the application does not convincingly demonstrate that environmental harm has been adequately mitigated through careful site selection, layout, and routing of infrastructure. This represents a failure to adhere to the established mitigation hierarchy, ultimately hindering the competent authority's ability to ascertain whether more suitable and less harmful alternatives are available. In the absence of a thorough assessment of alternatives, it is impossible to determine that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy undermines alignment with National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and the wellbeing of communities. The lack of a structured and comparative assessment is a significant omission that adds to the overarching conclusion that the application has not undergone adequate evaluation and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species presents significant deficiencies and fails to deliver a comprehensive understanding of ecological receptors in the West Lewis coastal environment. This area is a biologically active and sensitive marine system, yet the baseline data remains incomplete. The methodologies used do not adequately capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

One critical shortfall is the treatment of otters, which are a European Protected Species. The application does not appropriately acknowledge or assess their active use of coastal areas for foraging and movement. The oversight regarding their core foraging range and behavioural patterns leads to an insufficient evaluation of potential effects from construction disturbances, noise, and increased activity. This gap undermines the conclusions concerning the absence of significant effects on this species.

There are also substantial shortcomings in the assessment of basking sharks, particularly due to the reliance on aerial surveys that introduce significant 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 show frequent use of these waters. The failure to include or properly consider such data results in an incomplete baseline and diminishes the reliability of the presented conclusions.

The methodological weaknesses mean that any conclusions regarding negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty about the real scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, given that protected species have not been properly identified or evaluated. The uncertainties introduced hinder the ability to exclude adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, granting consent cannot be legally justified.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is fundamentally lacking, particularly in recognising the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply interconnected. The application simplifies heritage into a collection of isolated and static assets, neglecting their ongoing social, cultural, and spiritual importance within the community.

A significant shortcoming is evident in the treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial and spiritual sites, yet the assessment erroneously classifies them as static elements, overlooking their continued use and significance, as well as the

potential impact of development on their surroundings. This mischaracterisation leads to an inadequate evaluation of cultural effects and ignores their integral role in community life.

Moreover, the assessment fails to address intangible cultural heritage, such as the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are essential to the area's identity but have been completely overlooked, marking a considerable omission. Without acknowledging these factors, the true cultural implications of the proposed development remain misunderstood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity recognised as Indigenous People, yet the application lacks any process of Free, Prior and Informed Consent. This absence of genuine engagement calls into question the validity of the assessment and does not adhere to established principles of participation in matters that affect cultural and environmental interests.

A notable procedural failure is the lack of a compliant Island Communities Impact Assessment, which is required by the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic effects on the island community, thus obstructing a lawful determination.

From a policy standpoint, these deficiencies place the proposal at odds with National Planning Framework 4, especially concerning the protection of historic assets and places. The neglect of both tangible and intangible heritage and the failure to acknowledge living cultural practices clearly diverge from policy requirements.

Overall, the combined failure to consider living heritage, intangible cultural values, community rights, and statutory duties results in a substantial evidential gap. The application does not adequately assess the cultural impacts of the proposed development, leaving insufficient grounds for understanding the true cultural costs involved.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding seascape, landscape, and visual impacts is insufficient and does not capture the extent of change or the sensitivity of the surrounding environment. The coastline of West Lewis features an open Atlantic horizon, an undeveloped character, and a notable sense of remoteness. The close placement of large-scale turbines to the shoreline would introduce a continuous industrial presence, fundamentally changing this character and resulting in an irreversible transformation of the landscape.

The application fails to accurately depict the magnitude of visual change that would occur. Due to the scale and proximity of the turbines, they would dominate views from

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

Concerns also arise regarding the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially concerning important cultural heritage sites and high-value landscapes. This raises the possibility that the extent of visual impact has been underestimated, thereby compromising the assessment's reliability.

Moreover, there is a lack of evaluation of the interconnectedness of landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these heritage assets as isolated, failing to acknowledge their interdependence, which leads to an incomplete understanding of impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the preservation of natural places and historic assets. The scale of change contradicts the need to maintain landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of policy compliance.

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

In summary, the assessment does not accurately reflect the extent 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 preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal's assessment of construction and pollution risks is severely lacking, providing insufficient detail to evaluate the likely environmental effects. There is a significant degree of seabed preparation and installation work planned within a high-energy Atlantic environment. However, there are no developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the

application depends on mitigation and contingency measures that are slated to be prepared after consent is granted, which hinders any meaningful evaluation of their adequacy or effectiveness.

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

Furthermore, there is significant uncertainty surrounding 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 consequences of these impacts. This uncertainty also extends to potential effects on marine species and habitats that have already been recognised as sensitive within the broader assessment.

The lack of detailed emergency response procedures only exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether appropriate safeguards are available to address potential pollution events. This adds procedural risk and undermines 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. It is critical that likely significant effects and mitigation strategies are assessed before consent is granted. The absence of this information means that a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with relevant policy requirements regarding environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast support a diverse marine ecosystem alongside an active fishing industry. However, the assessment of fisheries and marine life related to the proposal is inadequate, failing to provide a solid evaluation of the ecological and socio-economic impacts. The application does not establish that these vital uses and habitats can be protected or maintained without significant disruption.

A critical concern is the assumption that fishing activities can be displaced without

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

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed project presents significant shortcomings in its assessment of onshore infrastructure, which is incomplete and does not encompass the full range of impacts stemming from what constitutes a single integrated project. The onshore works, which include cabling across protected moorland, the construction of a substation near Stornoway, and the establishment of access routes through sensitive landscapes, are intrinsically linked to the offshore turbines. However, these components are assessed separately, leading to a fragmented approach that obscures the true scale of environmental and socio-economic effects.

The absence of a thorough assessment of the impacts associated with the onshore

elements particularly fails to address the implications of excavation across areas of deep peat, especially within Barvas Moor, a significant carbon store and ecologically sensitive habitat. This gap in the assessment prevents a comprehensive understanding of the overall environmental footprint of the project.

Furthermore, the application's exclusion or deferral of the evaluation of onshore impacts hinders the proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all parts of a project be examined collectively; however, the disjointed evaluation of offshore and onshore elements leaves the combined impacts on peatlands, habitats, and communities inadequately understood.

There are also serious concerns regarding potential risks to sensitive habitats such as machair systems and peatland environments, which are afforded policy protection. The application lacks evidence that these impacts have been fully assessed or that appropriate measures to avoid them have been established, revealing a substantial evidential gap in relation to biodiversity protection.

The proposal raises additional issues related to carbon balance, as the disturbance of peatland releases stored carbon, potentially resulting in a carbon debt that contradicts the objectives of renewable energy development. The application does not sufficiently address this critical issue or demonstrate that the overall carbon balance remains favourable.

Moreover, the routing of infrastructure through active croft land presents possible conflicts with existing land use and legal rights. There is a lack of evidence confirming that the necessary consents or processes have been initiated, which raises concerns about the deliverability and lawful implementation of the project.

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

Collectively, the fragmentation of project components, the lack of comprehensive assessment, and the insufficient evidence regarding environmental and land use impacts render this aspect of the application incomplete and unreliable, which in turn obstructs a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an evaluation regarding dark skies and nocturnal wildlife is a significant oversight in the Environmental Impact Assessment. The West Lewis coastline boasts exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism appeal. The introduction of permanent red aviation lighting, which will be visible over long distances, is set to create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time

environment.

Furthermore, the application does not consider the impact this lighting would have on visual amenity, landscape character, or the experience of both residents and visitors. This lack of assessment is particularly concerning, given the critical role that dark skies play in the area's identity and in emerging sectors like astro-tourism. The failure to address these impacts results in a notable gap in the landscape and environmental evaluation.

Equally alarming is the neglect of potential impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which may cause disorientation and elevate the risk of collision. The application omits any lighting impact assessment or phototaxis study, failing to evaluate how aviation lighting could affect these species or increase mortality rates.

This issue is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which does not adequately reflect nocturnal activity or associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time data creates a substantial gap in comprehending ecological impacts.

Without a thorough assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites might be negatively impacted. The required evidential standard to confidently exclude adverse effects cannot be achieved, invoking the precautionary principle and preventing a lawful determination.

From a policy standpoint, these omissions are in conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. They also diminish the overall evaluation of landscape and seascape impacts, as the character of the night-time environment is a crucial element of the landscape.

In conclusion, the failure to assess dark skies and nocturnal wildlife represents a substantial evidential gap. The lack of baseline data, impact modelling, and species-specific analysis means the application is incomplete and cannot 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 Spiorad na Mara Offshore Wind Farm proposal demonstrates a profound failure to comply with the principles of sustainable development as mandated by statutory duties, national policy, and evidential standards. This application revisits core issues that previously led to the refusal of the Lewis Wind Power proposal in 2008, when the extent of industrialisation was deemed unacceptable. Notably, it is now presented within a policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are critical deficiencies in the evidential basis necessary for determination. The

application fails to present complete baseline data and continues to rely on an undefined design envelope. Furthermore, it depends on unspecified mitigation measures and neglects significant impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of the likely significant effects and residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches the statutory requirements set out in the Islands (Scotland) Act 2018. Additionally, the failure to disclose the entire Social Impact Assessment is a material omission. These flaws obstruct the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal stands in direct opposition to National Planning Framework 4. It does not adequately protect biodiversity, natural environments, or cultural heritage. It fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been properly evaluated, which obscures their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold needed to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding 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 mitigated to an acceptable level.

In summary, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, in conjunction with policy conflicts and unresolved environmental risks, hinder a lawful and evidence-based decision. Therefore, the competent authority must either refuse consent based on these grounds or invoke the relevant regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

Having been born here and now bringing up my own young family, I cannot comprehend how devastating a project of this scale will be to our lives.

From the obvious visual impact from our home and the beaches we visit, it just doesn't seem right to go ahead. We have a rich environment with some of the cleanest waters in the world - why destroy this?

Working within the NHS, I also have great concern for what this may mean should and a new influx of population mean during construction, far less additional strain on already expensive and tight essential transport links.

For something so large scale to be built in one of the windiest, wildest places in the UK, it just seems there has been an oversight in considering the location and scale of the project and whether it is actually able to withstand the brutal elements .

We live here remember- can we 100% be guaranteed great, sustained instant benefit- especially when considering we are living in the area of highest fuel poverty.

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: 84450FCD

Member of the public 928

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 grounded in a thorough review of the Environmental Impact Assessment Report and its supporting documentation, revealing significant deficiencies across various dimensions, including planning, environmental, cultural, and procedural aspects. 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 from the scale and design of the proposal, particularly regarding its adherence to statutory requirements, national policy, and the principles of sustainable development.

The application lacks a solid evidential foundation necessary for a lawful determination. Key environmental data is absent, baseline information is inadequate and inconsistent, and crucial elements of the proposal remain undefined. The reliance on a flexible design framework hinders the ability to evaluate likely significant effects, and the unspecified nature of mitigation measures prevents assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by reliable evidence.

Moreover, there are significant conflicts with established 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 adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and overall environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent, compromising the capacity of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal, featuring large turbines positioned close to the shoreline, raises critical concerns about landscape capacity, visual dominance, and environmental consequences. The combination of insufficient information, dependence on undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents several significant deficiencies that undermine its reliability and transparency regarding the proposal's environmental effects. Notably, the application's use of a flexible Project Design Envelope lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty, thereby inhibiting a consistent application of a worst-case scenario. Such an approach compromises the integrity of the assessment and obscures the true extent of environmental impacts from both the public and the competent authority.

Furthermore, the application depends heavily 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 in the future obstructs any substantive evaluation of effectiveness or the assessment of residual impacts. The deferral of critical information to post-consent stages is procedurally unacceptable, as it contradicts the fundamental objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures are clearly established prior to determination.

Additionally, the assessment suffers from substantial evidential deficiencies, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. This results in uncertainties surrounding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are presented without adequate supporting data. The lack of sufficient information leads to an inability to fully understand cumulative and worst-case impacts and introduces scientific uncertainties that do not align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, it fails to demonstrate compliance with National Planning Framework 4, which includes requirements for biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been comprehensively assessed or that appropriate safeguards are implemented.

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 inadequacies prevent a lawful and robust assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The current application presents significant deficiencies in its assessment of marine ecology and protected species, failing to offer a comprehensive and reliable understanding of ecological receptors in the West Lewis coastal environment. This area

is a highly sensitive and biologically active marine system, yet the baseline data provided is incomplete, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a sound evidential foundation for evaluating potential impacts.

A notable oversight concerns otters, a European Protected Species, where the application inadequately acknowledges and evaluates their active utilisation of coastal regions for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to an insufficient assessment of the potential impacts resulting from construction disturbance, noise, and increased activity. This gap significantly undermines the conclusions regarding the absence of substantial effects on this species.

Additionally, the assessment of basking sharks reveals further shortcomings, as the reliance on aerial surveys introduces a considerable detection bias, especially under Atlantic conditions. This methodology is likely to underestimate their presence when compared with established land-based observations that indicate a frequent use of these waters. The omission of such relevant data results in an incomplete baseline, thereby compromising the reliability of the conclusions drawn.

These methodological flaws result in conclusions regarding negligible or non-significant effects being based on assumptions rather than on robust evidence. The lack of sufficient baseline data also impedes a meaningful evaluation of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This lack of clarity creates uncertainty regarding the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements outlined in the Environmental Impact Assessment regime and National Planning Framework 4, as the identification and assessment of protected species are inadequate. The uncertainty introduced by these deficiencies precludes the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these circumstances, it is not lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents an ornithological assessment that is significantly flawed, with substantial gaps in evidence and inconsistencies that compromise its conclusions. This region of the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are located within the development site, yet the

assessment falls short in evaluating the implications of potential displacement, collision risks, or habitat loss.

Moreover, there is a fundamental contradiction in the application, where the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are unsupported by the evidence available.

The evidence provided does not sufficiently show that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unharmed. The importance of these feeding grounds is inadequately acknowledged, and reliance on modelling techniques introduces further uncertainty, especially for severely declining species such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly in the face of incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines in a recognised migratory corridor presents a significant risk by creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to properly assess the long-term consequences of sustained mortality in this corridor or consider the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with gaps in data and limitations in modelling, indicates that the requisite standard of being beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, which hinders a lawful conclusion that could support 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 remain unaffected directly conflicts with national policy.

All these factors combined render the assessment unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. These shortcomings hinder a thorough evaluation of impacts and lead to the overall conclusion that the application does not satisfy the statutory requirements needed for a valid determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to disclose the full Social Impact Assessment is a significant concern that undermines the Environmental Impact Assessment process. Without this transparency, the competent authority cannot conduct a robust evaluation of the social, economic, and health implications of the proposed development. The absence

of complete data constitutes a material omission and fails to meet the evidential requirements necessary for lawful decision-making.

Local residents have expressed measurable stress, anxiety, and concern due to the scale and proximity of the proposal, which reflects a tangible impact rooted in direct engagement. This evidence, derived from community feedback, highlights the risks associated with the development but remains inadequately addressed in the application due to the non-disclosure of the full assessment.

Moreover, the developer's findings indicate a perception of the proposal as a threat to community identity and cohesion, with significant concerns about "cultural loss." However, these issues have not been fully integrated into the application or given proper consideration. As a result, the true human and social cost of the development remains obscured, limiting the ability to assess the overall significance of these impacts.

From a policy perspective, there is a failure to comply with National Planning Framework 4, which emphasizes the need for developments to support positive health outcomes and avoid harm. The existing adverse effects highlighted in the available evidence have not been sufficiently disclosed, making it impossible to demonstrate adherence to this policy.

Collectively, these issues reveal a concerning gap in the assessment process. The non-disclosure of the full Social Impact Assessment, coupled with the evidence of existing negative impacts, results in an incomplete and unreliable evaluation. This hinders the ability to make a lawful determination regarding the application and highlights the necessity for a comprehensive understanding of the social impacts involved.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The 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 assessment of construction and pollution risks is notably deficient, lacking the necessary detail to properly evaluate the likely environmental effects. The proposed works involve significant seabed preparation and installation activities within a dynamic Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that would be developed after consent, which obstructs any meaningful assessment of their adequacy and effectiveness.

This dependence on undefined future measures is particularly alarming due to the sensitivity of the environment in question. The West Lewis coastline is known for its clean coastal waters and significant habitats, both of which are susceptible to disturbances caused by sediment and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

Furthermore, there is considerable uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbances and cable installations. Without thorough 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 recognised as sensitive in the broader assessment.

Adding to these concerns is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application undermines the ability to evaluate whether adequate safeguards are in place for responding to pollution events. This creates procedural risks and hampers the competent authority's ability to assess environmental protection measures prior to determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements established under the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated prior to granting consent, and without this information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with relevant policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application presents a number of critical deficiencies that undermine its reliability regarding the assessment of fisheries and marine life. It fails to provide a comprehensive evaluation of the ecological and socio-economic impacts associated with the proposal. The waters off the West Lewis coast are home to both a thriving marine ecosystem and an active fishing industry, yet the application does not demonstrate how these essential uses and habitats will be preserved or maintained without significant disruption.

A major concern arises from the assumption that fishing activities can be displaced without repercussions. The application lacks evidence to support the availability and

accessibility of alternative fishing grounds that could withstand any additional pressure. This significant omission raises the risk of overfishing in other areas, which may lead to wider economic implications for the local fishing fleet. Without a clear, evidence-based assessment, the true impacts on fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable risks to marine species, particularly due to underwater noise resulting from construction activities. The use of high-energy hammer piling over an extended period threatens to disturb marine life across considerable distances, particularly affecting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application minimises the importance of these effects without adequate supporting evidence.

There is also a notable inconsistency within the application, as it acknowledges the need for licences to permit harm to European Protected Species while concurrently describing the anticipated impacts as negligible. This contradiction raises serious questions about the credibility of the assessment and its alignment with the Habitats Regulations, especially in cases where anticipated harm necessitates legal authorisation.

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

From a policy standpoint, the application fails to demonstrate compliance with the 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 effects on marine biodiversity, thereby preventing any conclusion that the proposal aligns with the principles of sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment regarding onshore infrastructure is fundamentally lacking and does not adequately address the full range of impacts arising from what constitutes a singular integrated project. The offshore turbines and the onshore works are inherently interconnected; however, they are evaluated independently, leading to a fragmented analysis that conceals the true extent of environmental and socio-economic repercussions.

The onshore components encompass the installation of cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the creation of associated access infrastructure through delicate landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, a significant carbon reservoir and ecologically important habitat. The application fails to deliver a thorough evaluation of these consequences, thus hindering a complete understanding of the project's overall environmental impact.

By omitting or postponing the assessment of onshore impacts, the application obstructs a proper analysis of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; nevertheless, the delineation of offshore and onshore elements results in an incomplete comprehension of the combined effects on peatlands, habitats, and local communities.

Additionally, there are considerable risks posed to sensitive habitats, including machair systems and peatland environments, which are designated for policy protection. The application does not establish that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, creating a significant evidential deficiency in the context of biodiversity protection.

Concerns also arise regarding the carbon balance implications of the proposal. The disturbance of peatland results in the release of stored carbon, potentially creating a carbon debt that contradicts the goals of renewable energy development. The application inadequately addresses this concern or fails to demonstrate that the overall carbon balance remains advantageous.

Furthermore, the routing of infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application does not furnish evidence that the necessary consents or procedural steps have been commenced, raising doubts about both the feasibility and lawful execution of the project.

From a policy standpoint, the failure to evaluate the project in its entirety and to confirm protection for peatlands, habitats, and land use interests is at odds with the National Marine Plan and the National Planning Framework 4. The inability to show that impacts can be circumvented or mitigated further diminishes the application's credibility.

In summary, the separation of project elements, the lack of a comprehensive assessment, and the absence of evidence pertaining to environmental and land use impacts render this section of the application deficient and untrustworthy, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks an assessment of dark skies and nocturnal wildlife, which constitutes a significant omission. The coastline of West Lewis is characterised by its exceptionally dark skies, integral to the area's

environmental quality, cultural identity, and tourism appeal. The proposed introduction of permanent red aviation lighting, which would be visible over extensive distances, is anticipated to create a continuous and intrusive "wall of light" across the western horizon, fundamentally altering the night-time environment.

There is no consideration of how this lighting may impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly significant given the critical role of dark skies in the local identity and the growing sectors of astro-tourism. The failure to evaluate these impacts highlights a considerable gap in the overall assessment of the landscape and environment.

Equally concerning is the absence of an evaluation concerning nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit a high sensitivity to artificial lighting due to phototaxis, which can result in disorientation and an increased risk of collision. The application lacks any lighting impact assessment or phototaxis study, failing to address how the proposed aviation lighting could affect these species or contribute to increased mortality rates.

This shortfall is exacerbated by the reliance on daytime survey data within the ornithological assessment, which does not adequately capture nocturnal activity or associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has not been evaluated. The failure to provide site-specific night-time data creates a crucial gap in the understanding of ecological impacts.

Without a thorough assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites might face adverse effects. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt remains unfulfilled, necessitating the application of the precautionary principle and precluding a lawful determination.

From a policy standpoint, these omissions contravene the National Planning Framework 4 in terms of protecting natural environments and ensuring environmental quality. Furthermore, this lack of assessment undermines the comprehensive evaluation of landscape and seascape impacts, given that the character of the night-time environment is a vital aspect of the overall ecosystem.

In summary, the failure to assess dark skies and nocturnal wildlife creates a substantial evidential gap. The application is incomplete, lacking essential baseline data, impact modelling, and species-specific analyses, rendering it inadequate for supporting a lawful determination.

TOURISM

The assessment provided on the impacts of tourism is fundamentally lacking, failing to address the economic and social ramifications for a vital sector of the Isle of Lewis's economy. Tourism thrives on the region's wild coastline, near-pristine landscapes, dark

skies, and a profound sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it does not offer any quantitative analysis regarding how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contributions of this sector.

Significantly, the tourism sector has seen remarkable growth, rising from £65 million in 2017 to over £81.5 million, with more than 1,000 jobs supported and accounting for up to 16% of the island's economy. However, the application neglects to model the potential impacts of seascape industrialisation and environmental degradation on Tourism Gross Value Added or the broader economic resilience of the area. Without such crucial analysis, it remains unclear whether the proposed development would provide a net economic benefit or harm an already established and flourishing sector.

The assessment fails to recognise the critical role that environmental quality plays in supporting tourism, particularly the significance of unspoiled landscapes and dark skies for enhancing visitor experiences and tapping into emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a substantial gap in understanding the implications for a recognised and expanding segment of the local economy.

For an island community that lacks extensive economic diversification, the inadequate evaluation of tourism impacts carries broader consequences for employment, local businesses, and the sustainability of the community as a whole. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been assessed as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly regarding the economic impact and the necessity to establish a net benefit. Furthermore, it contradicts strategic objectives that identify tourism as a priority growth sector, lacking sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

Overall, the failure to quantify tourism impacts, evaluate the environmental drivers of visitor behaviour, and consider the economic dependency of the island culminates in a significant evidential gap. This gap hinders a thorough assessment of economic effects, ultimately leading to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as outlined in statutory duties, national policy, and evidential standards. It mirrors the central issues that led to the 2008 rejection of the Lewis Wind Power proposal, which found the level of industrialisation unacceptable. This new application is presented within a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and the wellbeing of communities.

There are significant gaps in the evidential basis necessary for proper determination of the application. The use of an undefined design envelope, reliance on unspecified mitigation measures, and the absence of crucial impact pathways, including those related to nocturnal wildlife, full onshore infrastructure, and tourism, have resulted in an incomplete Environmental Impact Assessment. This inadequacy hinders a comprehensive understanding of the likely significant effects or residual impacts.

Procedural shortcomings are also evident, notably the lack of a compliant Island Communities Impact Assessment, which breaches statutory obligations under the Islands (Scotland) Act 2018. The failure to provide a complete Social Impact Assessment represents a serious omission that prevents the competent authority from evaluating the effects on community wellbeing, cultural identity, and economic resilience. These deficiencies render the application unfit for determination.

The proposal is at odds with the National Planning Framework 4, failing to prove the protection of biodiversity, natural spaces, and cultural heritage. It does not demonstrate 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 offshore and onshore components have not been adequately assessed, obscuring their implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. Evaluations of marine ecology, seabirds, protected species, and marine mammals remain incomplete and inconsistent in places. The evidence presented does not meet the threshold required to eliminate adverse effects beyond reasonable scientific doubt, thus engaging the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

Moreover, the proposal would 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 relationships, and adverse impacts on tourism are permanent effects 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 obstructs a lawful and evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or invoke the appropriate regulatory measures to request the submission of the missing information.

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

Additional Comments

As a local business owner I am concerned about the impact on tourism going forward but as someone from the island I am concerned about the impact on the island wildlife

and infrastructure. As a nurse I am concerned about the impact on local services, our hospital is already at capacity most of the time without have all these extra people also locals already struggle to get gp and dental appointments and that's before adding all these extra people. As a parent of a young family I chose to return to the island to raise my family as it is safer but also so we could enjoy a lifestyle that includes enjoying the lovely beaches and scenery. We love enjoying the out doors and particularly seeing the wildlife which will be greatly impacted by

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: 2698232D