Member of the public 929

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a careful examination of the Environmental Impact Assessment Report and its supporting documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. Situated off the west side of the Isle of Lewis, this area is characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural identity. The proposed development's scale, design, and proximity to the shoreline raise serious concerns regarding its alignment with statutory requirements, national policies, and the principles of sustainable development.

The application does not provide a sufficient evidential basis for a lawful decision. There is a notable absence of critical environmental data, with baseline information that is both limited and inconsistent. Key components of the proposal remain undefined, which undermines the ability to assess likely significant effects. Additionally, the reliance on unspecified mitigation measures makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to offer a comprehensive understanding of the potential environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

Substantial policy conflicts are evident throughout the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. The application does not convincingly demonstrate that it can meet national obligations to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests necessary for obtaining consent and compromise the ability of the competent authority to determine the development's acceptability from a policy perspective.

Furthermore, the unprecedented scale of the proposal, with large turbines located near the shoreline, raises significant issues related to landscape capacity, visual impact, and overall environmental consequences. In light of the insufficient information provided, reliance on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with established policies, it is evident that the application is incomplete and cannot support a lawful determination. In these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report associated with this proposal is fundamentally flawed, lacking a full, transparent, and dependable account of the anticipated environmental effects. The reliance on a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, introduces substantial uncertainty. This situation hinders the ability to apply a worst-case scenario consistently, undermining the assessment's integrity. As a result, the impacts described may not accurately reflect the actual development that will be constructed, thus obscuring the true extent of environmental effects from both the public and the competent authority.

Additionally, the application places considerable emphasis on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Consent is sought on the premise that any environmental harm will be addressed later, obstructing any meaningful evaluation of the effectiveness of such measures or an 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 regime, which mandates that significant effects and mitigation measures must be clearly outlined prior to determination.

Moreover, there are substantial evidential deficiencies within the application, including gaps in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are put forward without adequate supporting data. The lack of sufficient information precludes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be aligned with statutory requirements.

Consequently, the application fails to meet the evidential threshold necessary under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This activates the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, including its stipulations related to biodiversity protection and environmental integrity, as it cannot be confirmed that impacts have been thoroughly assessed or that appropriate safeguards exist.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings impede a lawful and thorough assessment of environmental effects, leaving the competent authority ill-equipped to determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application inadequately addresses the assessment of alternatives, failing to meet the requirements of the Environmental Impact Assessment regime. Instead of providing a structured and reasoned comparison of realistic alternatives based on their environmental impacts, it offers merely a narrative of project evolution. This method

does not prove that less harmful options have been properly identified or assessed in preference to more damaging solutions.

The lack of a transparent, evidence-based comparison regarding alternative offshore locations, development scales, or design configurations is evident. Particularly, there is no indication that the developer has genuinely considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. The West Lewis coastline's sensitivity and the critical role that proximity to shore plays in determining impact highlight the shortcomings of this analysis. Consequently, one cannot conclude that the proposed siting represents the least damaging option.

These shortcomings also extend to cable routing and landfall assessment, as there is inadequate evidence that alternative routes have been properly explored to avoid or reduce impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been employed, leading to a reliance on post-design mitigation measures instead.

As a result, the application does not show that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy prevents the competent authority from assessing whether less harmful and more suitable alternatives are available. Without a thorough alternatives assessment, it cannot be concluded that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, these deficiencies jeopardise compliance with National Planning Framework 4, especially concerning the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a material omission that reinforces the conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species lacks comprehensiveness, failing to deliver a reliable overview of the ecological receptors in the West Lewis coastal environment. This area is characterised by its sensitivity and biological activity, yet the baseline data presented is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of key species. Consequently, the assessment lacks a solid evidential foundation necessary for evaluating potential impacts.

A significant shortcoming pertains to otters, classified as a European Protected Species. The application neglects to appropriately identify and assess their use of coastal regions for foraging and movement. This oversight regarding their core foraging range and behavioural patterns means that the possible impacts of construction-

related disturbances, noise, and increased human activity have not been adequately analysed. As a result, this compromises any conclusions drawn about the absence of significant effects on this species.

In addition, the evaluation of basking sharks is hindered by reliance on aerial surveys, which can introduce substantial detection bias, particularly under challenging Atlantic conditions. This method is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate a frequent presence in these waters. The failure to integrate or properly consider such relevant data culminates in an incomplete baseline and diminishes the reliability of the conclusions reached.

The methodological shortcomings outlined lead to conclusions regarding negligible or non-significant effects being based on assumptions rather than on robust evidence. Moreover, the lack of adequate baseline data obstructs meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This results in uncertainty about the actual scale of risk faced by marine species and habitats.

From a regulatory standpoint, the application does not satisfy the criteria set forth by the Environmental Impact Assessment regime and the National Planning Framework 4, as there has been an insufficient identification and assessment of protected species. This uncertainty hinders the ability to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

When considered collectively, the incomplete baseline data, flawed methodologies, and unsupported conclusions render the assessment unreliable. These deficiencies obstruct a thorough evaluation of the impacts on marine ecology and protected species, culminating in the conclusion that the application lacks a solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment related to the ornithological impacts is fundamentally flawed, marked by significant gaps in evidence and internal inconsistencies that compromise its conclusions. The application does not satisfactorily demonstrate, to the necessary evidential standard, that internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline, will not be adversely affected. Located within key foraging areas and migratory pathways, the development raises concerns that are not adequately addressed, particularly regarding displacement, collision risk, and habitat loss.

A critical inconsistency arises in the application, where the developer asserts there are no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This contradiction casts doubt on the assessment's reliability and suggests that its

conclusions lack support from the underlying evidence. The evaluation does not sufficiently demonstrate 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 taken into account, and the reliance on modelling approaches introduces uncertainty, especially concerning species in severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, particularly in light of incomplete baseline data and an incomplete understanding of behavioural responses.

Additionally, the placement of turbines within a recognised migratory corridor poses an extra significant 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, as well as the potential effects on species with relatively small global populations, are not adequately assessed in the application.

From a regulatory standpoint, the application falls short of the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, combined with data deficiencies and modelling limitations, means that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and hinders a lawful conclusion in favour of consent. The identified deficiencies also indicate non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected directly conflicts with national policy.

Overall, the assessment is deemed unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a thorough evaluation of impacts and contribute to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage in the planning application is fundamentally flawed, neglecting to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply interconnected. Instead of acknowledging these relationships, the application reduces heritage to a collection of isolated and static assets, overlooking their ongoing social, cultural, and spiritual significance within the community.

There is a notable inadequacy in the treatment of culturally significant sites, such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment dismisses them as mere static features, failing to take into account their continued use and the implications of development on their surroundings. This misrepresentation leads to an incomplete understanding of cultural impacts and ignores the integral role these sites play in community life.

Moreover, the application does not address intangible cultural heritage, such as the Gaelic language and local traditions, nor does it recognise the long-standing connection between the community and the coastal environment. These elements are essential to the area's identity but are entirely overlooked, representing a serious gap in the assessment. The absence of these considerations means that the cultural implications of the development cannot be comprehensively grasped.

Concerns also arise regarding community rights and the process of engagement. The Gaelic-speaking population, which embodies distinct characteristics akin to those of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and does not align with recognised principles of participation in matters impacting cultural and environmental interests.

A significant procedural shortcoming is the failure to produce a compliant Island Communities Impact Assessment, a legal requirement under the Islands (Scotland) Act 2018. The absence of this assessment inhibits the competent authority from fulfilling its legal obligations to assess the social, cultural, and economic effects on the island community. This deficiency alone renders the determination process unlawful.

From a policy standpoint, these shortcomings put the proposal at odds with the National Planning Framework 4, especially regarding the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, as well as the failure to acknowledge living cultural practices, indicates a clear deviation from policy mandates.

When considered collectively, the shortcomings in assessing living heritage, intangible cultural value, community rights, and legal requirements create a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to furnish a sound basis 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 West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a significant sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline poses a risk of creating a continuous and dominant industrial presence, which would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

The application fails to adequately represent the extent of this visual change. Due to the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would directly impact visual amenity and erode the essential qualities of naturalness and remoteness, yet the assessment does not convey the significance of this level of impact in relation to such a sensitive landscape.

There are significant methodological issues regarding how visual viewpoints have been selected and presented. Evidence indicates that the chosen viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This situation risks underestimating the magnitude of the visual impact, which undermines the overall reliability of the assessment.

Another critical deficiency is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are situated within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these heritage assets in isolation rather than recognising their interdependence, resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

The anticipated industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This constitutes not only a visual impact but also a broader cultural and spatial harm that the application fails to assess adequately.

From a policy standpoint, the proposal contravenes National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of change proposed is inconsistent with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the absence of a robust worst-case assessment further undermines any assertion of compliance with relevant policies.

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

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

CONSTRUCTION AND POLLUTION RISKS

The application proposes substantial seabed preparation and installation works within a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate the likely environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans, as the application relies on mitigation and contingency measures to be prepared after consent. This reliance on undefined future measures is particularly concerning given the sensitivity of the receiving

environment.

The West Lewis coastline supports clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not provide sufficient detail on how these risks will be prevented, controlled, or monitored. Additionally, there is uncertainty regarding the scale and behaviour of sediment plumes 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 also extends to potential effects on marine species and habitats identified as sensitive within the wider assessment.

Compounding these concerns is the absence of detailed emergency response procedures. By deferring contingency planning to a post-consent stage, the application hinders the evaluation of whether adequate safeguards are in place to respond to pollution events. This introduces procedural risk and undermines the ability of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, deferring critical environmental safeguards conflicts with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to consent, and in the absence of such information, a lawful determination cannot be made. Furthermore, the application fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

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

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

evidence-based analysis, the potential impacts on fisheries and local livelihoods remain unclear.

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application regarding the project is fundamentally flawed due to its incomplete assessment of onshore infrastructure, which fails to account for the interconnected nature of the offshore turbines and onshore works. These elements should be evaluated as a cohesive unit, as their separation obscures the true magnitude of their environmental and socio-economic impacts. The onshore works involve cabling that traverses protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. Such activities include excavation in areas of deep peat, particularly within Barvas Moor, which is crucial both as a significant carbon store and as an ecologically sensitive habitat. The lack of a thorough assessment of these impacts hinders a complete understanding of the project's overall environmental footprint.

Additionally, by deferring or omitting the assessment of onshore impacts, the

application undermines the capacity to evaluate cumulative effects adequately. The Environmental Impact Assessment process mandates that all project components be considered in conjunction, yet the current approach leads to a lack of understanding of the combined effects on peatlands, habitats, and local communities. The risks posed to sensitive habitats such as machair systems and peatland environments, which are protected by policy, remain unaddressed in the application. It does not convincingly demonstrate that thorough assessments of these habitats have been conducted or that suitable avoidance measures have been considered, revealing a significant evidential gap regarding biodiversity protection.

There are also serious concerns about carbon balance stemming from this proposal. The disturbance of peatland can release carbon that has been stored, potentially incurring a carbon debt that contradicts the fundamental goals of renewable energy initiatives. The application falls short in addressing this critical issue, failing to show that the overall carbon balance is indeed favourable.

Moreover, the routing of infrastructure through active croft land raises conflicts with existing land use and legal rights. The application provides insufficient evidence that requisite consents or processes have been initiated, which casts doubt on the project's deliverability and lawful execution.

From a policy standpoint, the lack of a holistic assessment and the failure to ensure the protection of peatlands, habitats, and land use interests are in direct conflict with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be effectively avoided or mitigated significantly undermines the application. Overall, the disjointed treatment of project components, the absence of a comprehensive evaluation, and the insufficient evidence regarding environmental and land use impacts result in an application that is incomplete and unreliable, thus impeding a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances. This creates a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. 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.

There is a significant absence of assessment regarding the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. This gap is particularly notable given the growing importance of dark skies to local identity and emerging sectors such as astro-tourism. The Environmental Impact Assessment does not evaluate how the proposed lighting may affect these crucial aspects.

Equally concerning is the lack of evaluation regarding impacts on nocturnal wildlife. Several species, including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, are highly sensitive to artificial lighting, which can cause disorientation

and increase collision risks. The application does not provide a lighting impact assessment or phototaxis study, meaning it fails to consider how the proposed aviation lighting could affect these species or contribute to increased mortality.

Moreover, the reliance on daytime survey data in the ornithological assessment fails to capture nocturnal activity and related risks. Species such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation due to artificial lighting, yet this risk has not been examined. The lack of site-specific night-time data creates a crucial gap in understanding potential ecological impacts.

Without a thorough assessment of nocturnal impacts, it is impossible to determine whether protected species or designated sites could be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt has not been met, thus invoking the precautionary principle and obstructing a lawful determination.

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

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

TOURISM

The assessment regarding tourism impacts is notably lacking and does not address the economic and social ramifications for a vital sector of the Isle of Lewis economy. The success of tourism in the area relies heavily on its wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. The application states that 86% of visitors are attracted by the scenery; however, it fails to provide a quantified analysis of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the broader economic contribution.

Tourism on the Isle has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs, constituting as much as 16% of the island's economy. Despite this positive trajectory, the application does not examine how the potential industrialisation of the seascape and degradation of environmental quality may affect Tourism Gross Value Added or the overall economic resilience of the area. In the absence of such an analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or detract from an established and burgeoning sector.

Furthermore, the assessment neglects to acknowledge the significance of environmental quality in attracting tourists, particularly the value of unspoiled

landscapes and dark skies in enhancing visitor experience and tapping into emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a considerable gap in understanding the impacts on a recognised and growing aspect of the local economy.

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

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4, particularly concerning economic impacts and the necessity to showcase net benefits. Additionally, it contradicts strategic objectives that designate tourism as a priority growth sector and lacks adequate evidence for the competent authority to assess the economic outcomes of the proposal.

In summary, the deficiencies in quantifying tourism impacts, evaluating environmental factors that drive visitor behaviour, and acknowledging the island's economic dependency lead to a significant evidential void. This shortfall hinders a comprehensive evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates significant deficiencies that undermine its compliance with the principles of sustainable development as dictated by statutory duties, national policy, and evidential standards. It mirrors the critical issues that resulted in the 2008 rejection of the Lewis Wind Power proposal, where the extent of industrialisation was deemed unacceptable. This new application is submitted under a more robust policy framework, which prioritises biodiversity, peatland preservation, landscape integrity, and community wellbeing, yet it fails to meet these vital requirements.

The evidential basis for the application is markedly incomplete and unreliable. Notably, there are substantial gaps in baseline data, the proposal relies on an undefined design envelope, and the mitigation measures suggested remain unspecified. Furthermore, important impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, have not been addressed. As a result, the Environmental Impact Assessment does not provide a comprehensive understanding of the potential significant effects or residual impacts.

In addition to the shortcomings in evidence, there are also notable procedural flaws. The lack of a compliant Island Communities Impact Assessment constitutes a breach of the Islands (Scotland) Act 2018, while the failure to present a complete Social Impact Assessment signifies a material omission. Such deficiencies hinder the competent

authority's ability to properly evaluate the impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application inadequate for determination.

The proposal is fundamentally at odds with the National Planning Framework 4. It does not establish adequate protection for biodiversity, natural environments, and cultural heritage, fails to demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit, particularly due to the absence of modelling regarding tourism impacts. Additionally, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring potential consequences for peatlands, carbon balance, habitats, and crofting land.

There are unresolved environmental risks that remain uncertain and potentially significant. The evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent with each other. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been reached, invoking the precautionary principle and precluding a lawful determination that impacts are acceptable.

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

Collectively, these issues render the application both procedurally and substantively unfit for determination. The vast scale of information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. It is incumbent upon the competent authority to refuse consent based on these grounds or to invoke the relevant regulatory provisions to demand the submission of the necessary missing information.

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

Additional Comments

I wish to object to the planning application for MD-00011742 & MD-00011743 - Spiorad na Mara Limited - Spiorad na Mara offshore Wind Farm - Isle of Lewis.
The Spiorad na Mara wind farm would permanently industrialise the unspoiled coastal scenery and dark skies on the Isle of Lewis, destroying the very qualities that attract visitors to the islands. Tourism is built on the area's landscape, seascape, heritage, nature, and dark skies. This proposed development risks long-term damage to local businesses and the wider economy.
Scotland already produces more electricity than it uses. I feel that if other areas of the UK require more electricity they can build wind farms off their own coasts and not destroy our island environment. The electricity produced will go to England and the profits will go to the Canadian and Irish corporations behind it all with very little benefit

to our island communities.
Our island infrastructure is already overstretched and far from suitable for the incoming workforce and construction of this huge proposed windfarm.
I and my family, like many who live here, are highly sensitive to our environment and we would find the impacts from the wind farm quite unbearable. I believe it will have a detrimental effect on the communities' health and well-being.

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: 6669BBE5

Member of the public 930

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a review of the Environmental Impact Assessment Report and associated documents, highlighting material deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The wind farm is proposed to be located off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns regarding the proposal centre on its scale, proximity to the shore, and design, raising questions about its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application does not provide a sufficient evidential basis for a lawful determination. There is a lack of critical environmental data, while baseline information is limited and inconsistent. Additionally, key elements of the proposal are not clearly defined. The flexible design framework does not allow for a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the documentation fails to offer a comprehensive understanding of environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by strong evidence.

There are significant policy conflicts within the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to ascertain whether the development is acceptable from a policy standpoint.

The unprecedented scale of the proposal presents additional concerns, with large turbines positioned very close to the shoreline, raising issues of landscape capacity, visual dominance, and environmental impact. Overall, the lack of adequate information, dependence on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. In light of these factors, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents several critical deficiencies that undermine its reliability and transparency regarding the environmental effects of the proposal. A significant concern arises from the application of a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations. This ambiguity leads to considerable uncertainty and hampers the ability to apply a worst-case scenario consistently, thus compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately represent those of the final development, leaving both the public and the competent authority without a clear understanding of the actual environmental effects.

Furthermore, the application is heavily contingent on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. By seeking consent on the premise that any potential environmental harm will be rectified later, the assessment fails to provide a meaningful evaluation of these measures' effectiveness or an accurate appraisal of residual impacts. This postponement of essential information until after consent is granted is procedurally unacceptable and contradicts the core objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies be clearly established before making a determination.

Moreover, the report suffers from substantial evidential gaps, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This raises doubts about the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are drawn without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts, fostering scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not satisfy the evidential threshold mandated by the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate alignment with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it has not been shown that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation strategies, and the presence of significant gaps in baseline data collectively render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings impede a lawful and robust evaluation of the environmental effects, meaning that the competent authority is not adequately positioned to assess the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application proposes a development that does not adhere to the necessary statutory requirements of the Environmental Impact Assessment regime. Instead of

offering a coherent and evidence-based comparison of realistic alternatives concerning environmental effects, it provides a narrative of how the project has evolved. This narrative does not adequately demonstrate that less harmful options have been thoroughly identified, assessed, and chosen over more damaging solutions.

There is a lack of transparency and an absence of evidence in the comparison of alternative offshore locations, development scales, or design configurations. Notably, the application fails to show that the developer has genuinely considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts could be diminished. Given the sensitivity of the West Lewis coastline and the critical significance of proximity to shore in assessing impact, the lack of such analysis means it cannot be concluded that the proposed siting is the least damaging option.

The shortcomings also extend to the evaluation of cable routing and landfall assessment. There is insufficient evidence that alternative routes have been adequately explored to avoid or reduce impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The absence of a clear strategy to avoid impacts, along with a lack of comparative analysis, suggests that mitigation by design has not been appropriately applied, leading instead to reliance on post-design mitigation measures.

Consequently, the application does not illustrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This signifies a departure from the established mitigation hierarchy and leaves the competent authority unable to ascertain whether more suitable and less harmful alternatives are available. Without a comprehensive assessment of alternatives, it cannot be established that the proposal is sustainable or compliant with policy requirements.

From a policy standpoint, this deficiency undermines compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes 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 proposed development presents significant concerns regarding its impact on marine ecology and protected species. The assessment conducted does not provide a complete or reliable understanding of the ecological receptors within the West Lewis coastal environment, which is a highly sensitive and biologically active marine system. Incomplete baseline data and inadequate methodologies have failed to capture vital information regarding species presence, behaviour, and habitat use. Consequently, this assessment lacks a sound evidential basis for evaluating potential impacts.

Particularly concerning is the omission of otters, a European Protected Species. The

application does not adequately recognise or assess their active use of coastal areas for foraging and movement. This oversight in considering their core foraging range and behavioural patterns means that the potential effects of construction disturbance, noise, and increased activity remain insufficiently assessed. Such deficiencies undermine any conclusions regarding the absence of significant effects on the species.

Similarly, the assessment of basking sharks suffers from reliance on aerial surveys, which introduce significant detection bias in Atlantic conditions. This methodology is likely to underestimate their presence, especially when compared with established land-based observations that indicate frequent use of these waters. The failure to incorporate or properly consider these data leads to an incomplete baseline and further weakens the reliability of the conclusions drawn.

These methodological flaws result in conclusions regarding negligible or non-significant effects being based on assumptions rather than robust evidence. The absence of sufficient baseline data also obstructs meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises serious questions about the true scale of risk to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment presented in the application is flawed and inconsistent, raising serious concerns about its reliability. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already in decline. However, the application does not provide the required evidence to show that these species will not be adversely affected by the development. The proposed location falls within key foraging areas and migratory pathways, yet the assessment does not adequately address the risks of displacement, collision, or habitat loss.

There is a significant contradiction within the application, as the developer asserts no significant adverse effects while also advancing a Habitats Regulations derogation case. This case is only needed when significant harm is anticipated, casting doubt on the credibility of the assessment and suggesting that its conclusions lack proper support from the evidence. Additionally, the assessment fails to demonstrate that

seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will not be impacted. It does not fully consider the significance of these feeding grounds, and the reliance on modelling introduces uncertainty, especially for species like Kittiwakes and Fulmars that are in serious decline. The methodologies used are likely to underestimate mortality, particularly where the baseline data is incomplete and the behavioural responses of the species are not fully understood.

The positioning of turbines within a recognised migratory corridor creates significant risks, forming a barrier in a primary flight path for species travelling between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of ongoing mortality in this corridor or the potential effects on species with smaller global populations.

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

The identified deficiencies also indicate non-compliance with the National Planning Framework 4 regarding biodiversity protection and safeguarding of natural assets. The failure to prove that internationally important seabird populations will remain unaffected directly conflicts with national policy.

Overall, the assessment's internal inconsistencies, methodological weaknesses, and lack of sufficient evidence render it unreliable. These shortcomings hinder a thorough evaluation of impacts and lead to the 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 is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are deeply interconnected. The application employs a simplistic perspective, viewing heritage as a collection of isolated, static assets, rather than appreciating their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally important sites, notably the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practices; however, the assessment categorises them merely as static features. This oversight neglects their continued significance and the implications that development may have on their context. Such a mischaracterisation results in an incomplete understanding of cultural effects and overlooks their importance in community life.

Moreover, the assessment does not address intangible cultural heritage, such as the Gaelic language, local traditions, and the enduring relationship the community maintains with the coastal environment. These aspects are vital to the area's identity yet are completely omitted from the evaluation, marking a considerable gap. Without acknowledging these factors, the cultural impact of the proposed development cannot be adequately grasped.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population is recognised as having a distinct cultural identity, akin to that of Indigenous Peoples, yet there has been no undertaking of Free, Prior and Informed Consent. This lack of substantial engagement undermines the assessment's validity and fails to adhere to established principles regarding participation in matters affecting cultural and environmental interests.

A further procedural shortcoming is the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. In the absence of this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these inadequacies place the proposal in direct conflict with National Planning Framework 4, particularly concerning the safeguarding 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 requirements.

In conclusion, the collective failure to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a notable evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application does not offer a sound foundation for determining the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which included focus groups with local residents, has not been fully disclosed. This non-disclosure creates a significant evidential gap, hindering both public understanding and the competent authority's ability to assess the full extent of social risks identified in the developer’s own research.

Available summaries indicate that residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts have been confirmed through direct engagement rather than speculation. However, the failure to provide the complete assessment stifles proper scrutiny of the findings and limits the capacity to evaluate their significance in the decision-making process.

Moreover, the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” highlighted in the developer's own findings. Despite the acknowledgment of these impacts, they have not been adequately incorporated into the main application or afforded appropriate consideration. The lack of transparency surrounding the full Social Impact Assessment obscures the true human and social costs associated with the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is imperative for developments of this magnitude, particularly when community character and functioning may be jeopardised. By withholding the full dataset, the application does not provide a complete evidential basis for weighing the balance between benefits and harm.

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

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment, which constitutes a material omission within the application and fails to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the failure to disclose the complete Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the assessment insufficient and unreliable. This situation impedes lawful determination and supports the assertion that the application lacks the necessary information for adequate evaluation.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of seascape, landscape, and visual impacts associated with the proposal is significantly flawed and does not sufficiently address the extent of change or the sensitivity of the affected environment. The character of the West Lewis coastline is marked by its unspoilt Atlantic horizon, natural qualities, and profound sense of remoteness. The establishment of large-scale turbines near the shoreline would introduce a persistent industrial presence, which would fundamentally disrupt this character, leading to a permanent and irreversible alteration of the landscape.

The application inadequately illustrates the extent of the visual transformation. The considerable scale and proximity of the turbines would overshadow views from residential areas, historic sites, and frequently visited coastal spots, which would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the seriousness of this

impact or its importance within the context of such a delicate landscape.

There are significant methodological issues regarding the choice and representation of visual viewpoints. It appears that some viewpoints may not adequately represent the most sensitive receptors or the most adverse scenarios, particularly concerning critical cultural heritage sites and high-value landscapes. This raises concerns that the extent of visual impact has been downplayed, thereby questioning the credibility of the assessment.

Moreover, a critical shortcoming is the failure to consider the interconnectedness between landscape, seascape, and cultural heritage. Significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape context connected by visual and spatial relationships to the Atlantic horizon. The evaluation considers these as separate entities instead of recognising their interrelationship, leading to an incomplete understanding of the impacts on their setting and cultural value.

The industrialisation of the seascape would sever these essential relationships, changing the context in which heritage assets are perceived and disrupting their link to the natural horizon. This constitutes not merely a visual impact but a broader cultural and spatial detriment that the application does not sufficiently address.

From a policy standpoint, the proposal stands in direct contradiction to the National Planning Framework 4 concerning the safeguarding of natural areas and historic assets. The magnitude of change is inconsistent with the requirement to protect landscape character, visual amenity, and the setting of culturally significant locations. The lack of a comprehensive worst-case assessment further diminishes any assertion of policy adherence.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their visibility would be overwhelming and unavoidable. Consequently, the resulting alteration is fundamental and permanent, not something that can be mitigated to an acceptable degree.

In conclusion, the assessment fails to accurately depict the scale of impact, the environment's sensitivity, and the interconnected relationships between landscape and heritage. These shortcomings hinder a dependable evaluation and strongly support the assertion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is characterised by clean coastal waters and significant habitats that are at risk of sediment disturbance and contamination. The assessment of construction and pollution risks presented in the application is deficient, lacking the necessary detail to adequately evaluate potential environmental effects. The proposal entails extensive seabed preparation and installation works in a high-energy Atlantic environment. However, it fails to include fully developed Construction Environmental

Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that are to be formulated after consent is granted, which precludes any substantial assessment of their adequacy or effectiveness.

The application acknowledges the risks of sediment mobilisation and the possibility of accidental chemical or oil spills, yet it does not sufficiently explain how these risks will be prevented, controlled, or monitored. Moreover, there is uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. In the absence of robust modelling and well-defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also encompasses potential effects on marine species and habitats already identified as sensitive within the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a stage following consent, the application obstructs the evaluation of whether suitable safeguards are established to manage pollution events. This introduces procedural risks and hampers the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies be assessed prior to granting consent, and the absence of such information renders a lawful determination unfeasible. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

Overall, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively result in a materially deficient assessment. These deficiencies inhibit a thorough evaluation of construction and pollution risks, reinforcing the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

A critical concern is the assumption made within the application that fishing activities can be displaced without repercussions. There is no evidence provided that alternative fishing grounds are available, accessible, or capable of withstanding the increased pressure that displacement would create. This significant omission raises the risk of

overfishing in other areas, which could lead to broader economic consequences for the local fishing fleet. As a result, without an evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

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

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

The assessment is lacking in its consideration of cumulative impacts resulting from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity. This lack of clarity prevents any conclusion that the proposal aligns with the principles of sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The onshore components of the project encompass cabling across protected moorland, the construction of a substation near Stornoway, and the development of associated access infrastructure within sensitive landscapes. These activities involve excavation across areas of deep peat, particularly in Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The current application lacks a comprehensive assessment of the impacts associated with these works, which obstructs a complete understanding of the project's overall environmental footprint.

The assessment of onshore infrastructure is materially incomplete, as it fails to consider the full extent of impacts from what constitutes a single integrated project.

The offshore turbines and onshore activities are intrinsically linked; however, they are being evaluated separately, resulting in a fragmented approach that obscures the true scale of the environmental and socio-economic effects. By deferring the assessment of onshore impacts, the application inhibits an accurate evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components are reviewed collectively, yet the distinction between offshore and onshore elements means the combined effects on peatlands, habitats, and local communities are not fully understood.

Moreover, there are significant risks to sensitive habitats, including machair systems and peatland environments, which are subject to policy protections. The application fails to demonstrate that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, highlighting a clear evidential gap in relation to biodiversity protection. Concerns regarding carbon balance also arise from the proposal. Disturbances to peatland can release stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application does not adequately address this issue nor show that the overall carbon balance remains favourable.

In addition, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is insufficient evidence in the application to confirm that the necessary consents or processes have been initiated, leading to concerns about the project's 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 the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further diminishes the application’s credibility.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife represents a significant gap within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area’s environmental quality, cultural identity, and tourism value. The proposed introduction of permanent red aviation lighting, which would be visible over long distances, creates an intrusive “wall of light” effect across the western horizon. This alteration to the night-time environment is not addressed in terms of its impact on visual amenity, landscape character, or the experiences of both residents and visitors. Given the relevance of dark skies to local identity and emerging sectors such as astro-tourism, this omission is particularly concerning.

Moreover, the application neglects to evaluate the impacts on nocturnal wildlife, which

is crucial given that species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly susceptible to artificial lighting. Phototaxis can lead to disorientation and increased risk of collision for these species. The absence of any lighting impact assessment or phototaxis study means there is no consideration of how aviation lighting could affect these species and potentially increase mortality rates.

This critical oversight is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to capture nocturnal activities and related risks. Species like Kittiwakes, which might forage or migrate at night, are equally at risk of disorientation from artificial lighting; however, this risk remains unassessed. Without site-specific night-time data, a fundamental understanding of ecological impacts is lacking.

Consequently, without a thorough assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt cannot be satisfied, invoking the precautionary principle and thereby hindering a lawful determination.

From a policy perspective, this omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. It also diminishes the overall evaluation of landscape and seascape impacts since the character of night-time environments is an essential aspect of the overall landscape.

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

TOURISM

The evaluation of tourism impacts in the application is significantly lacking, failing to assess the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's natural assets, including its wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. Although the application notes that 86% of visitors are attracted by scenery, it does not provide any quantified analysis of how large-scale offshore infrastructure may influence visitor numbers, behaviour, or overall economic contributions.

The tourism sector has experienced considerable growth, with revenue increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and constituting up to 16% of the island's economy. However, the application fails to model how the industrialisation of the seascape and a decline in environmental quality could affect Tourism Gross Value Added and the broader economic resilience of the island. Without such critical analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or instead jeopardise a vital and expanding sector.

Moreover, the assessment neglects to address the significance of environmental quality in bolstering tourism. The unspoiled landscapes and dark skies are crucial to visitor experiences, particularly for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this oversight, creating a substantial gap in the understanding of impacts on a recognised and expanding segment of the local economy.

Given the context of an island community with limited economic diversification, the omission of tourism impact assessments has broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated, as is mandated under the Islands (Scotland) Act 2018.

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

In summary, the collective failure to quantify tourism impacts, examine the environmental drivers of visitor behaviour, and recognise the island's economic dependency creates a substantial evidential gap. This deficiency undermines any robust evaluation of economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal does not meet the requirements for sustainable development when evaluated against statutory duties, national policy, and evidential standards. The application brings forth the same core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Now, it is being presented under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the application’s evidential basis. It lacks complete baseline data and continues to utilise an undefined design envelope. Additionally, it relies on unspecified mitigation measures and fails to address key impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. The Environmental Impact Assessment is incomplete, which hinders a comprehensive understanding of potential significant effects or residual impacts.

Procedural failures are also evident. The absence of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment is a notable omission. These issues obstruct the competent authority from properly evaluating impacts on

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

The proposal conflicts with National Planning Framework 4. It fails to ensure the protection of biodiversity, natural places, and cultural heritage, does not establish that health and wellbeing impacts are acceptable, and lacks evidence of net economic benefit due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been thoroughly assessed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

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

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

In summary, the application is procedurally and substantively unfit for determination. The significant information deficiencies, along with conflicts in policy and unresolved environmental risks, obstruct the possibility of a lawful and evidence-based decision. The competent authority must refuse consent on these grounds or invoke the appropriate regulatory provisions to obtain the required missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 40179DA3

Member of the public 931

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, submitted under marine licensing and Environmental Impact Assessment regimes. The objection arises from an examination of the Environmental Impact Assessment Report and related documentation, highlighting significant planning, environmental, cultural, and procedural deficiencies. Located off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns about the proposal's scale, proximity, and design call into question its compliance with statutory requirements, national policy, and sustainable development principles.

The application does not provide a sufficient evidential basis for a lawful determination. There is a lack of critical environmental data, limited and inconsistent baseline information, and essential aspects of the proposal remain undefined. The reliance on a flexible design framework inhibits a clear understanding of potentially significant effects, and the unspecified nature of mitigation measures raises questions about their effectiveness. Consequently, the documentation fails to offer a complete and informed perspective on environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust evidence.

Substantive conflicts with policy are evident. The proposal seems inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests necessary for consent and compromise the competent authority's ability to determine the proposal’s acceptability in policy terms.

The unprecedented scale of the proposal raises alarm, with large turbines planned close to the shoreline, creating significant issues around landscape capacity, visual dominance, and environmental impact. In light of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete and unable to support a lawful determination. In this context, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary detail and transparency to reliably account for the potential environmental effects of the proposal. The flexibility allowed by the Project Design Envelope, which does not commit

to specific turbine dimensions or layouts, introduces considerable uncertainty. This creates challenges in applying a worst-case scenario consistently, thereby undermining the integrity of the assessment. As a result, the impacts presented may not accurately represent what will ultimately be constructed, leaving both the public and the competent authority unable to understand the true extent of the environmental effects.

Furthermore, the application is overly reliant on mitigation measures, monitoring strategies, and management plans that have not yet been established. Seeking consent based on the assumption that environmental harm will be managed later does not allow for a proper evaluation of effectiveness or the assessment of residual impacts. This postponement of crucial information until post-consent stages is procedurally unacceptable and contradicts the intended purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies must be clearly identified before any determination is made.

Additionally, there are serious evidential deficiencies present, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially where the assessment concludes that effects are negligible or non-significant without robust supporting data. The lack of adequate information hampers the understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to meet statutory requirements.

Consequently, the application does not satisfy the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal also does not comply with National Planning Framework 4, which includes obligations related to biodiversity protection and environmental integrity, as it cannot be demonstrated that the impacts have been fully assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, the lack of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings hinder a lawful and thorough assessment of environmental effects, preventing the competent authority from making a determination based on the information submitted.

ASSESSMENT OF ALTERNATIVES

The application lacks a structured, evidence-based comparison of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. It presents a narrative of project evolution instead of a reasoned analysis of realistic options based on environmental effects. This omission indicates that less harmful alternatives have not been adequately identified, assessed, and chosen over more damaging solutions.

There is no clear comparison 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, which would likely lessen visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline highlights the critical importance of proximity to shore in assessing impacts. Therefore, the absence of this analysis means that one cannot conclude that the proposed siting is the least damaging option available.

The deficiencies also extend to the evaluation of cable routing and landfall assessment, where there is insufficient evidence that alternative routes have been explored to avoid or reduce impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been effectively implemented, relying instead on post-design mitigation measures.

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

From a policy standpoint, this shortcoming 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 omission that reinforces the conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is significantly flawed and lacks a comprehensive understanding of ecological receptors. This marine system is biologically active and highly sensitive, yet the data collected is incomplete. The methodologies employed fail to adequately capture the presence, behaviour, and habitat use of species, leading to an assessment that cannot reliably inform evaluations of potential impacts.

One notable shortcoming is the treatment of otters, a species protected under European law. The application does not adequately recognise or assess their active foraging and movement patterns along the coast. By not considering their core foraging range, the assessment fails to evaluate the potential impacts of construction disturbance, noise, and increased activity on these animals. This oversight undermines any conclusions drawn regarding significant effects on otters.

Additionally, there are serious deficiencies in the assessment of basking sharks. The reliance on aerial surveys introduces a significant detection bias, particularly in Atlantic conditions, which is likely to lead to an underestimation of their presence. This is further highlighted by established land-based observations that indicate these sharks

frequently utilise these waters. The omission of such crucial data results in an incomplete baseline, which in turn weakens the conclusions drawn.

The methodological weaknesses indicate that any conclusions suggesting negligible or non-significant effects are based on unfounded assumptions rather than solid evidence. Furthermore, the lack of sufficient baseline data inhibits the meaningful assessment of cumulative and indirect impacts, seasonal variations, and broader ecosystem interactions. This introduces uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment requirements and the stipulations set out in National Planning Framework 4, as it fails to properly identify or assess protected species. This uncertainty hinders the ability to rule out adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Consequently, it is not lawful to grant consent under these circumstances.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment untrustworthy. These significant deficiencies prevent a thorough evaluation of impacts on marine ecology and protected species, ultimately suggesting that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the development's impact on seabirds is fundamentally flawed. It presents significant gaps in evidence and contains internal inconsistencies that undermine its findings. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to demonstrate adequately that these species will not be adversely affected. Key foraging areas and migratory pathways are situated near the development, yet the assessment does not thoroughly evaluate risks related to displacement, collision, or habitat loss.

There is a critical contradiction within the application itself. While the developer asserts that there will be no significant adverse effects, they simultaneously submit a Habitats Regulations derogation case, which is only necessary if 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 proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The significance of these feeding grounds is inadequately acknowledged, and the reliance on modelling approaches introduces uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies used may underestimate mortality rates, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Placing turbines within a recognised migratory corridor adds another layer of risk. This placement effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of ongoing mortality in this corridor have not been sufficiently assessed, nor have 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, data gaps, and modelling flaws means that the required standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and renders the conclusion in support of consent unlawful.

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

In summary, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These issues hinder a robust evaluation of impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed application fundamentally fails to acknowledge the West Lewis coastline as a vibrant cultural landscape where language, community, tradition, and environment are deeply intertwined. Instead of recognising heritage as a living, evolving aspect of community life, the assessment reduces it to mere isolated and static assets, neglecting their ongoing social, cultural, and spiritual significance.

A significant oversight in the assessment is 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, yet they are inaccurately characterised as static features. This mischaracterisation ignores their continued use and the profound impact that development may have on their surrounding environment, resulting in an incomplete evaluation of their cultural significance to the community.

Moreover, the assessment does not take into account intangible aspects of cultural heritage, including the Gaelic language and the traditions that have long connected the community to the coastal environment. These elements are integral to the area's identity and their absence from the assessment is a significant flaw. Without acknowledging these vital factors, the true cultural impact of the proposed development remains obscured.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity, recognised as Indigenous People, yet

there has been no process of Free, Prior and Informed Consent initiated. This lack of meaningful engagement significantly undermines the legitimacy of the assessment, disregarding essential principles of participation in decisions that affect cultural and environmental interests.

The procedural shortcomings are compounded by the absence of a compliant Island Communities Impact Assessment, a legal requirement under the Islands (Scotland) Act 2018. The lack of this assessment means that the competent authority cannot adequately fulfil its legal responsibilities to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders any determination regarding the application unlawful.

From a policy standpoint, these deficiencies place the proposal in direct conflict with National Planning Framework 4, especially concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, as well as the neglect of living cultural practices, indicates a clear deviation from policy requirements.

In summary, the combined failure to assess living heritage, intangible cultural values, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the proposed development remain unassessed, and the application does not provide a sufficient foundation for understanding the true cultural cost of this proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is a significant concern that compromises the integrity of the evaluation process. While the developer engaged local residents through focus groups as part of this assessment, the full report remains unpublished, leading to a critical evidential gap. This omission prevents both the public and the competent authority from fully grasping the social risks that have been identified in the developer's own research.

Furthermore, existing evidence reveals that residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are directly linked to community engagement and are therefore substantiated, not speculative. The failure to disclose the complete assessment hampers proper scrutiny of these findings, thus limiting the ability to understand their significance in the decision-making process.

Additionally, there are indications that the proposal threatens community identity and cohesion, with the developer acknowledging "cultural loss" in their findings. Yet, these concerns have not been adequately incorporated into the main application nor given the attention they deserve. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This deficiency also undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for

developments of this magnitude, particularly where community character and functioning could be compromised. The failure to provide the complete dataset means the application lacks a thorough evidential basis for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and mitigate harm, yet the evidence at hand points to existing adverse effects that remain inadequately addressed. Without the full assessment, it is impossible to establish compliance with this policy.

The procedural ramifications are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material shortcoming within the application and a failure to fulfil the evidential requirements outlined in the Environmental Impact Assessment framework.

In summary, the decision to withhold the full Social Impact Assessment, coupled with the evidence of current adverse impacts, results in an incomplete and unreliable evaluation. This situation obstructs lawful determination and underscores the conclusion that the application is not substantiated by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts related to the proposed turbines is fundamentally inadequate, failing to capture the scale of change and the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its unspoiled Atlantic horizon, undeveloped nature, and a profound sense of remoteness. The proposed large-scale turbines, positioned near the shoreline, would establish a persistent industrial presence that would irrevocably alter this character and lead to a permanent transformation of the landscape.

Furthermore, the application does not accurately depict the extent of this visual change. The size and proximity of the turbines would dominate views from local residential areas, historical sites, and popular coastal locations. This would significantly affect visual amenity and undermine the landscape's defining features of naturalness and remoteness. The assessment fails to properly articulate the significance of these impacts within such a sensitive landscape.

There are serious methodological flaws in how visual viewpoints have been selected and presented. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or the worst-case scenarios, particularly concerning critical cultural heritage sites and high-value landscapes. This raises concerns that the true magnitude of visual impact has been downplayed, compromising the assessment's reliability.

Additionally, there is a notable failure to consider the interconnectedness between

landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape, linked visually and spatially to the Atlantic horizon. The assessment treats these heritage assets in isolation, ignoring their interdependence, which leads to an incomplete understanding of how the proposal will impact their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are appreciated and severing their ties to the natural horizon. This is not merely a visual issue; it represents a wider cultural and spatial detriment that has not been properly evaluated in the application.

From a policy perspective, the proposal stands in direct conflict with National Planning Framework 4, which aims to protect natural environments and historical assets. The scale of the proposed change fails to meet the necessity of preserving landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case scenario assessment further undermines any assertion of compliance with policy.

Moreover, it is evident that the impacts noted cannot be effectively mitigated. Given the height, scale, and proximity of the turbines, their presence would be imposing and inescapable. The anticipated changes are therefore fundamental and permanent, rather than amenable to acceptable levels of mitigation.

In summary, the assessment does not accurately reflect the magnitude of impact, the sensitivity of the environment, or the interrelated nature of landscape and heritage. These shortcomings preclude a dependable evaluation and affirm the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks associated with the proposal is significantly lacking in detail, which hinders the ability to evaluate the likely environmental impacts. The project entails substantial seabed preparation and installation works in a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that are to be devised after consent has been granted, making it impossible to adequately assess their effectiveness or sufficiency.

This reliance on vague future measures is particularly alarming given the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and essential habitats that are at risk of sediment disturbance and contamination. The application does acknowledge various risks, including sediment mobilisation and the potential for accidental chemical or oil spills, yet it fails to outline sufficient strategies for prevention, control, or monitoring of these risks.

Moreover, there is uncertainty concerning the scale and behaviour of sediment plumes

that may result from seabed disturbance and cable installation. The lack of robust modelling and well-defined management strategies means that it is impossible to ascertain the extent, duration, or ecological consequences of these potential impacts. This uncertainty also extends to the possible effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent stage, the application does not allow for an evaluation of whether adequate safeguards are in place to address pollution incidents. This introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation strategies are evaluated before consent is granted. When this information is missing, a lawful determination cannot be made. Furthermore, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

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

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.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal fails to include any assessment of dark skies and nocturnal wildlife, which is a substantial oversight within the Environmental Impact Assessment. The West Lewis coastline is noted for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value. By introducing permanent red aviation lighting that is visible over extensive distances, the proposal would create an intrusive "wall of light" across the western horizon, significantly altering the night-time environment.

Furthermore, there is no evaluation of how this lighting would impact visual amenity, landscape character, or the experiences of both residents and visitors. The importance of dark skies to the region’s identity and the emerging sectors of astro-tourism highlights the significance of this omission. Consequently, there exists a clear gap in the overall landscape and environmental assessment due to the lack of consideration for these impacts.

The proposal also neglects to evaluate the effects of artificial lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly susceptible to artificial light, which can lead to disorientation and

an increased risk of collision. The absence of a lighting impact assessment or a study on phototaxis means that there is no understanding of how aviation lighting could affect these species or contribute to increased mortality rates.

Moreover, the reliance on daytime survey data in the ornithological assessment fails to account for nocturnal activity or related risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts.

Without a thorough assessment of nocturnal impacts, it remains 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, thereby engaging the precautionary principle and precluding a lawful determination.

From a policy standpoint, the omission directly contravenes National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, it undermines the broader evaluation of landscape and seascape impacts, as the character of night-time is a fundamental component of the environment.

In summary, the total absence of an assessment concerning dark skies and nocturnal wildlife reveals 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 of the Isle of Lewis has experienced substantial growth, with its economic contribution rising from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and constituting up to 16% of the island's economy. However, the current application lacks a thorough assessment of how proposed large-scale offshore infrastructure could impact visitor numbers, behaviours, and the overall economic contribution of tourism, despite acknowledging that 86% of visitors are attracted by the area's scenic beauty. This absence of a quantified analysis raises significant concerns regarding whether the development may yield a net economic benefit or potentially undermine a crucial and expanding sector.

Furthermore, the assessment inadequately addresses the vital relationship between environmental quality and tourism, neglecting to evaluate how the preservation of unspoiled landscapes and dark skies enhances the visitor experience. The lack of a Dark Skies Assessment exacerbates this oversight, highlighting a substantial gap in understanding the implications for emerging markets such as nature-based tourism and astro-tourism.

The implications of not assessing tourism impacts extend beyond the sector itself, affecting local employment, businesses, and the sustainability of the community,

particularly within an island context that exhibits limited economic diversification. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities, as mandated under the Islands (Scotland) Act 2018, have not been properly evaluated. From a policy standpoint, the application fails to adhere to the principles outlined in the National Planning Framework 4, especially concerning the necessity of demonstrating a net benefit and aligning with strategic objectives that prioritise tourism as a growth sector. This inadequacy further hampers the competent authority's ability to thoroughly assess the economic consequences of the proposal.

In conclusion, the deficiencies in quantifying tourism impacts, evaluating the environmental factors that drive visitor behaviour, and recognising the island's economic dependency culminate in a significant evidential gap. This gap hinders a comprehensive evaluation of the economic effects and suggests that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is procedurally and substantively unfit for determination, highlighting significant deficiencies in information and clear policy conflicts. The proposal fails to meet the requirements of sustainable development, not only in terms of statutory duties but also when measured against national policy and evidential standards. It echoes the unresolved core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Now, it is presented within a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps in baseline data undermine the application, which uses an undefined design envelope and relies on unspecified mitigation measures. This lack of clarity extends to significant omissions, such as the failure to address impact pathways related to nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, inhibiting an adequate understanding of potential significant effects or residual impacts.

There are also notable procedural shortcomings. The absence of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment represents a material omission. These issues obstruct the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

The proposal directly conflicts with the National Planning Framework 4, as it does not adequately demonstrate protection for biodiversity, natural places, and cultural heritage. Furthermore, it fails to provide acceptable evidence regarding health and wellbeing impacts, alongside a lack of tourism impact modelling that prevents a demonstration of net economic benefit. The cumulative impacts of both offshore and onshore components have not been properly assessed, obscuring effects on

peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been met, thereby engaging the precautionary principle and blocking a lawful conclusion that impacts are acceptable.

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

In light of these considerations, it is evident that the scale of information deficiencies, coupled with policy conflicts and unresolved environmental risks, precludes a lawful and evidence-based decision. 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

The island is, yet again, being used as a sacrificial community. Without regard to heritage, environment or general well being
The negative impact on tourism is particularly important as I am employed in retail and hospitality

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: 6E8EA0E9

Member of the public 932

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary thoroughness and transparency, failing to present a reliable overview of the anticipated environmental effects associated with the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for the turbines, creates significant uncertainty. This uncertainty impedes the consistent application of a worst-case scenario analysis, thereby compromising the assessment's integrity. As a result, the potential impacts may not accurately represent what will ultimately be constructed, hindering both public understanding and the competent authority's ability to grasp the full extent of environmental consequences.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consent is being sought under the premise that any environmental harm will be mitigated in the future, obstructing a thorough evaluation of these measures' effectiveness or an assessment of any residual impacts. This postponement of critical information to post-consent phases is procedurally unacceptable, as it contradicts the fundamental purpose of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation strategies be clearly articulated prior to determination.

Moreover, there are substantial evidential shortcomings present, including gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This results in ambiguity concerning the scale and significance of impacts, especially where negligible or non-significant effects are asserted 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 mandated by the Habitats Regulations, which requires the exclusion of adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, failing to satisfy requirements relating to biodiversity protection and environmental integrity, as it cannot confirm that impacts have been comprehensively assessed or that appropriate safeguards are implemented.

Overall, the combination of reliance on an unspecified design envelope, lack of defined mitigation measures, and the gaps present in baseline data contribute to the Environmental Impact Assessment Report being both unreliable and incomplete. These deficiencies obstruct 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 assessment of marine ecology and protected species has significant deficiencies, leading to an incomplete understanding of the ecological receptors in the West Lewis coastal environment. This area is highly sensitive and biologically active, yet the baseline data used is inadequate. The methodologies employed do not effectively capture important aspects such as species presence, behaviour, and habitat use, which undermines the assessment's ability to evaluate impacts accurately.

A notable gap is the treatment of otters, which are classified as a European Protected Species. The application does not adequately recognise their use of coastal areas for foraging and movement. Without a proper assessment of their core foraging range and behaviour, the potential impacts of construction activities, noise, and increased human activity remain insufficiently evaluated. This flaw weakens the conclusions regarding the absence of significant effects on otters.

Additionally, the assessment of basking sharks is hampered by the over-reliance on aerial surveys, which carry a significant risk of detection bias, particularly under Atlantic conditions. Such reliance likely leads to an underestimation of their presence, especially in light of established land-based observations that demonstrate frequent use of these waters. The failure to integrate or adequately consider this data results in a further incomplete baseline, diminishing the reliability of the conclusions drawn.

These methodological shortcomings mean that claims of negligible or non-significant effects rest on assumptions rather than solid evidence. The lack of sufficient baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. Consequently, there remains a level of uncertainty regarding the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set out in the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. This uncertainty prevents the exclusion of adverse effects with reasonable scientific certainty, thus invoking the precautionary principle. Given these circumstances, it is clear that consent cannot be granted lawfully.

In summary, the combination of inadequate baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies impede a robust evaluation of impacts on marine ecology and protected species and contribute to the overall conclusion that the application lacks a sound evidential basis.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's failure to publish the full Social Impact Assessment represents a significant evidential gap that hinders both public understanding and the competent authority's ability to evaluate the social risks identified in the developer's own research. Summaries indicate that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are therefore grounded in reality. However, without access to

the complete assessment, proper scrutiny of these findings is impossible, limiting the capacity to determine their significance in the decision-making process.

Moreover, there is a clear perception that the proposal poses a direct threat to community identity and cohesion, with “cultural loss” highlighted in the developer's findings. Despite the recognition of these impacts, they have not been adequately integrated into the main application or given appropriate weight, as the withholding of the full Social Impact Assessment obscures the true human and social cost of the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this nature, especially when community character and functioning are at stake. The application's failure to provide the complete dataset results in an incomplete evidential basis for assessing the balance between potential benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and avoid harm, yet the available evidence suggests existing adverse effects that remain undisclosed. Without the full assessment, it is impossible to establish compliance with this policy.

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

In conclusion, the combination of non-disclosure of the full Social Impact Assessment and evidence of existing adverse impacts renders the assessment incomplete and unreliable. This ultimately prevents a lawful determination and reinforces the assertion that the application lacks sufficient information to be supported.

CONSTRUCTION AND POLLUTION RISKS

The assessment of the potential environmental effects related to construction and pollution is inadequate, lacking the detail necessary for a comprehensive evaluation. The proposal entails extensive seabed preparation and installation works in a high-energy Atlantic environment, yet it fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on unspecified mitigation and contingency measures to be created after consent, which hinders any meaningful assessment of their sufficiency or effectiveness.

Given the sensitivity of the receiving environment, this dependence on undefined future measures raises significant concerns. The West Lewis coastline is home to clean

coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application recognises risks such as sediment mobilisation and accidental chemical or oil spills, it does not adequately outline how these risks will be prevented, controlled, or monitored.

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

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether appropriate measures are in place to address pollution events. This situation introduces procedural risks and undermines the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the delay in establishing critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated before consent is granted, and the absence of such information means that a lawful determination cannot be achieved. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, inadequate management plans, and uncertainty regarding potential impacts result in a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks and further substantiate the conclusion that the application is incomplete.

TOURISM

The assessment of tourism impacts within the application is severely lacking, failing to address the economic and social ramifications for a critical sector of the Isle of Lewis economy. Tourism relies heavily on the area's unspoiled coastline, near-pristine landscapes, dark skies, and a sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide a quantified assessment of how the proposed large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution of the sector.

The significance of tourism is evident in its substantial growth, with revenue increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Despite this positive trend, the application does not analyse how the potential industrialisation of the seascape and the resultant loss of environmental quality might affect Tourism Gross Value Added or

broader economic resilience. Without such analysis, it is impossible to ascertain whether the proposed development would provide a net economic benefit or detract from a sector that is both established and expanding.

Furthermore, the assessment neglects to consider the crucial role of environmental quality in fostering tourism, particularly the significance of unspoiled landscapes and dark skies in enhancing visitor experience and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this deficiency, creating a notable gap in understanding the impacts on a recognised and growing component of the local economy.

In an island community with limited economic diversification, the oversight in assessing tourism impacts carries broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated in accordance with the Islands (Scotland) Act 2018.

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

Collectively, the shortcomings in quantifying tourism impacts, assessing the environmental factors that drive visitor behaviour, and considering the economic dependency of the island lead to a significant evidential gap. This undermines the ability to conduct a thorough evaluation of the economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as stipulated by statutory duties, national policy, and evidential standards. It echoes the primary concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This current application is submitted under a policy framework that ostensibly strengthens the emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still falls short.

A critical examination reveals that the application lacks a complete and reliable evidential basis for determination. Significant gaps in baseline data exist, alongside the continued use of an undefined design envelope. The reliance on unspecified mitigation measures and the exclusion of crucial impact pathways, particularly relating to nocturnal wildlife, the full extent of onshore infrastructure, and potential tourism effects, leave the Environmental Impact Assessment incomplete. This inadequacy precludes a comprehensive understanding of likely significant effects or residual

impacts.

Moreover, clear procedural shortcomings are present. The absence of a compliant Island Communities Impact Assessment signifies a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to provide a complete Social Impact Assessment is a serious omission. These inadequacies inhibit the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal stands in stark contradiction to the National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural spaces, and cultural heritage. Furthermore, it fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, largely due to insufficient tourism impact modelling. The cumulative effects of both offshore and onshore components have not been appropriately assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The necessary evidential standard to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, necessitating the application of the precautionary principle and barring a lawful conclusion regarding acceptable impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The significant information deficiencies, alongside policy conflicts and unresolved environmental risks, obstruct a lawful, evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or invoke the relevant regulatory provisions to compel the submission of the missing information.

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

Additional Comments

I have strong objections to the proposed works as I am very very concerned about the noise pollution and damage to the sea life, in addition the damaging effect this will have on tourism. I don’t know anyone, local or tourist who I have spoken to who sees any benefit to the island with this project.

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: 2DA6F5C4

Member of the public 933

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 regimes. The review of the Environmental Impact Assessment Report and its supporting documentation reveals significant deficiencies across planning, environmental, cultural, and procedural aspects. This development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. The proposal's scale, design, and proximity to the shoreline raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

There is a concerning lack of adequate evidential support for a lawful determination within the application. It is evident that critical environmental data is absent, baseline information is both limited and inconsistent, and key components of the proposal remain unspecified. The use of a flexible design framework complicates the assessment of likely significant effects, while the reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the documentation fails to provide a comprehensive or informed understanding of the potential environmental, cultural, or community impacts, and claims asserting negligible or non-significant effects lack robust evidence.

The proposal is marked by clear and substantive conflicts with established policies. It is inconsistent 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. The application does not satisfactorily demonstrate adherence to national requirements for protecting biodiversity, climate considerations, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent and weaken the competent authority's ability to deem the development acceptable within policy frameworks.

The unprecedented scale of this proposal, with large turbines located close to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. In light of the insufficient information presented, reliance on undefined mitigation strategies, evident evidential weaknesses, and clear policy non-compliance, it is apparent that the application is incomplete and incapable of facilitating a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application fails to meet the evidential threshold required under the Habitats Regulations, which necessitates the exclusion of adverse effects beyond reasonable scientific doubt. This situation is particularly concerning regarding protected species and sensitive habitats, invoking the precautionary principle. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, especially the mandates associated with biodiversity protection and environmental integrity. There is no assurance that impacts have been fully assessed, nor that adequate safeguards are in place.

The Environmental Impact Assessment Report is significantly inadequate and does not offer a complete, transparent, or reliable overview of the potential environmental effects linked to the proposal. By utilising a flexible Project Design Envelope without specific commitments to turbine dimensions, layouts, or configurations, a considerable degree of uncertainty is introduced. This uncertainty hinders a consistent evaluation of a worst-case scenario and ultimately compromises the integrity of the assessment. Consequently, the impacts presented may not accurately represent the development that would actually be constructed, leaving both the public and the competent authority unable to fully grasp the true extent of environmental effects.

Additionally, there are serious evidential deficiencies within the report. These include substantial gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such shortcomings result in ambiguity surrounding the scale and significance of the impacts, especially in instances where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information inhibits a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that is incompatible with statutory requirements.

Moreover, the application places considerable reliance on undefined mitigation measures, monitoring strategies, and management plans that are not yet clearly articulated. Seeking consent on the premise that any potential environmental harm will be addressed at a future stage undermines meaningful evaluation of effectiveness and assessment of residual impacts. This deferral of essential information to post-consent stages is procedurally unacceptable and contradicts the fundamental purpose of the Environmental Impact Assessment regime, which demands that significant effects and mitigation are explicitly established prior to determination.

When combined, the reliance on an undefined design envelope, the lack of specified mitigation strategies, and the notable gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These critical deficiencies obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives is significantly lacking and does not fulfil the statutory requirements outlined in the Environmental Impact Assessment regime. The application fails to provide a structured and reasoned comparison of viable alternatives based on their environmental effects, instead offering a narrative account of the project's evolution. This method does not demonstrate that less harmful options have been thoroughly identified, assessed, and selected over more damaging solutions.

There is a notable absence of transparent and evidence-based comparisons of alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has genuinely considered placing turbines further offshore, which would likely lessen visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in assessing impact, the lack of such analysis prevents any conclusion that the proposed siting is indeed the least damaging option.

The shortcomings extend to the evaluation of cable routing and landfall, where there is inadequate evidence that alternative routes have been properly investigated to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The failure to present a clear avoidance strategy and the lack of comparative analysis suggest that mitigation through design has not been effectively employed, with an overreliance on post-design mitigation measures instead.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species demonstrates significant deficiencies, leaving local concerns unaddressed regarding the ecological integrity of the West Lewis coastal environment. This area is known for its biological activity and sensitivity, yet the application relies on incomplete baseline data and methodologies that do not adequately reflect species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a reliable evidential basis for determining impacts.

A notable gap in the assessment pertains to otters, a European Protected Species. The failure to thoroughly recognise and evaluate their foraging and movement patterns along the coast raises critical issues. Without a proper understanding of their core foraging range, the potential effects of construction-related disturbances such as noise and increased activity are inadequately assessed. This oversight undermines any claims regarding the lack of significant effects on otters.

The evaluation of basking sharks reveals further methodological shortcomings. The reliance on aerial surveys introduces a substantial detection bias, particularly under Atlantic conditions, likely leading to an underestimation of their presence. In contrast, established land-based observations indicate that these waters are frequently utilised by basking sharks. Ignoring or inadequately considering such data results in an incomplete baseline, further compromising the reliability of the conclusions drawn.

These methodological flaws mean that assertions of negligible or non-significant effects rest on assumptions rather than solid evidence. The lack of sufficient baseline information obstructs a meaningful assessment of cumulative and indirect impacts, including variations over seasons and broader ecosystem interactions. This situation creates uncertainty around the actual risks posed to marine species and their habitats.

From a regulatory standpoint, the application fails to align with the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it does not adequately identify or assess protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, which invokes the precautionary principle. In light of these considerations, it is clear that consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions leads to an unreliable assessment. These issues hinder a thorough evaluation of the impacts on marine ecology and protected species and reinforce the conclusion that the application lacks a sound 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 assessment of the proposed development fails to adequately consider the West Lewis coastline as a living cultural landscape, where the environment, language, tradition, and community are interconnected. The application approaches heritage in a reductive manner, treating it as a collection of isolated and static assets. This perspective ignores the ongoing social, cultural, and spiritual roles these heritage sites play within the community.

Significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are mischaracterised as static features despite being active places for burial and spiritual practice. This oversight fails to recognise their continued use and meaning, as well as the potential impact of development on their surroundings. Consequently, the evaluation of cultural effects is incomplete, disregarding the integral role these sites have in community life.

Moreover, the application neglects to address intangible cultural heritage, including the Gaelic language and traditions, which are essential to the identity of the area. The absence of these elements from the assessment is a critical omission, as it prevents a

comprehensive understanding of the cultural impact of the development.

There are also serious concerns regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity, with characteristics that align with those of Indigenous Peoples. However, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's legitimacy and does not adhere to established principles for participation in decisions that affect cultural and environmental interests.

Furthermore, a vital procedural flaw is the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

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

Overall, the neglect of living heritage, intangible cultural values, community rights, and statutory obligations leads to a substantial evidential gap. The cultural impacts of the development have not been properly assessed, and the application does not sufficiently justify the potential cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of a complete Social Impact Assessment significantly hampers the evaluation of social, health, and wellbeing impacts related to the development proposal. While the developer engaged with local residents through focus groups, the absence of the full report creates a notable evidential gap. This omission hinders both public understanding and the competent authority's ability to grasp the full range of social risks identified by the developer's own research.

Residents have already reported experiencing stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement with the community and are not mere speculation. However, the failure to release the complete assessment limits proper scrutiny and impedes the ability to assess the significance of these findings within the decision-making framework.

Moreover, the proposal is perceived as a threat to community identity and cohesion, with findings highlighting potential "cultural loss." Yet, these important social impacts have not been adequately integrated into the main application or given the necessary consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency also compromises the Environmental Impact Assessment

process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. By failing to provide the complete dataset, the application does not offer a robust evidential basis to assess the balance between benefits and potential harm.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and mitigate harm, yet the evidence presented reveals existing adverse effects that have not been fully disclosed. Without the complete assessment, compliance with this policy remains unproven.

The procedural consequences 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, which constitutes a material omission in the application and fails to meet the evidential standards required by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts on the West Lewis coastline is fundamentally inadequate, failing to capture the significant scale of change and the sensitivity of the surrounding environment. This coastline is characterised by its unspoiled Atlantic horizon, undeveloped nature, and a profound sense of remoteness. The introduction of large-scale turbines close to the shoreline would create an overwhelming industrial presence that would fundamentally change this character and lead to a permanent transformation of the landscape.

Furthermore, the application does not sufficiently address the extent of this visual change. The turbines' size and proximity would dominate the views from residential areas, historic sites, and popular coastal locations, leading to a detrimental impact on visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment inadequately conveys the significance of these impacts within the context of such a delicate landscape.

There are also significant methodological issues regarding the selection and depiction of visual viewpoints. Evidence indicates that these viewpoints may not accurately capture the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises concerns that the true magnitude of visual impact has been minimised, calling into question the reliability of the assessment.

Additionally, the assessment neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape context that is visually and spatially linked to the Atlantic horizon. Treating these sites as isolated assets fails to acknowledge their interdependence, leading to an incomplete evaluation of the impacts on their cultural significance and setting.

The industrialisation of the seascape would disrupt these connections, altering how heritage assets are experienced and severing their ties to the natural horizon. This represents not only a visual concern but also a broader cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal directly contravenes National Planning Framework 4 concerning the protection of natural environments and historic assets. The magnitude of change is incompatible with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. Moreover, the absence of a comprehensive worst-case assessment further weakens any argument for policy compliance.

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

In summary, the assessment falls short of accurately depicting the scale of impact, the environmental sensitivity, and the interrelation of landscape and heritage. These shortcomings hinder a dependable evaluation and underscore the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application lacks sufficient detail regarding the assessment of construction and pollution risks, rendering it materially deficient. It involves significant seabed preparation and installation activities within a high-energy Atlantic environment, yet does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be formulated post-consent, which hampers any meaningful evaluation of their adequacy or effectiveness.

This reliance on undefined future measures is particularly troubling in light of the sensitivity of the receiving environment. The West Lewis coastline is known for its clean coastal waters and significant habitats that are at risk from sediment disturbance and contamination. While the application does recognise risks such as sediment mobilisation and accidental chemical or oil spills, it fails to furnish adequate detail on the methods of prevention, control, or monitoring of these risks.

Moreover, there exists uncertainty surrounding the scale and behaviour of sediment

plumes produced by seabed disturbance and cable installation. Without comprehensive modelling and explicitly defined management strategies, the potential extent, duration, and ecological effects of these impacts cannot be determined. This uncertainty extends to potential consequences for marine species and habitats that have already been acknowledged as sensitive within the broader assessment.

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

From a regulatory viewpoint, the postponement of vital environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated prior to consent, and in the absence of this information, a lawful determination cannot be achieved. The application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the lack of defined mitigation measures, inadequate management plans, and the uncertainty regarding potential impacts collectively indicate that the assessment is insufficient. These deficiencies inhibit a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of fisheries and marine life associated with the application is inadequate, failing to provide a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast not only support a diverse marine ecosystem but also house an active fishing industry. However, the application does not adequately demonstrate that these habitats and uses can be maintained without considerable disruption.

A significant concern is the assumption that fishing activities can be displaced without adverse effects. The application lacks evidence that alternative fishing grounds are accessible, available, or able to bear additional pressure. This oversight is critical, as displacement may lead to overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a well-supported assessment, the impacts on fisheries and the livelihoods of those dependent on them remain unclear.

The proposal also poses considerable risks to marine species, particularly due to underwater noise generated during construction activities. The use of high-energy hammer piling for extended periods is likely to cause disturbances over large areas, potentially affecting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population raises serious concerns.

Nevertheless, the application minimizes the significance of these effects, lacking adequate supporting evidence.

There is an evident contradiction in the application concerning the necessity for licences to authorise harm to European Protected Species, while concurrently describing such impacts as negligible. This inconsistency undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, particularly where harm is expected to a level that requires legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed project lacks completeness, particularly concerning the onshore infrastructure, which is critical to understanding the full range of impacts associated with this integrated project. The offshore turbines and onshore works are fundamentally interconnected, yet the current assessment treats them separately. This fragmented approach obscures the true scale of the environmental and socio-economic consequences.

The onshore components encompass the installation of cabling across protected moorland, the construction of a substation close to Stornoway, and necessary access infrastructure that traverses sensitive landscapes. Notably, these activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and is an ecologically sensitive area. The application fails to provide a comprehensive assessment of the impacts on these environments, leading to an incomplete understanding of the overall environmental footprint of the project.

Moreover, the exclusion or deferment of onshore impact assessments prevents a thorough evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all aspects of a project be considered collectively; however,

the division between offshore and onshore elements results in an inadequate understanding of the combined impacts on peatlands, habitats, and local communities.

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

Concerns also arise regarding carbon balance, as the disturbance of peatland can release stored carbon, leading to a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this concern or prove that the overall carbon balance remains favourable.

Furthermore, routing the infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not show that the necessary consents or processes have been initiated, calling into question the project's deliverability and legality.

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

In summary, the disjointed evaluation of project components, the lack of a comprehensive assessment, and the absence of evidence concerning environmental and land use impacts render this part of the application incomplete and untrustworthy, obstructing lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks a critical evaluation of dark skies and nocturnal wildlife, marking a significant oversight. The West Lewis coastline is defined by its exceptionally dark skies, which are essential to environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting will create a persistent and disruptive “wall of light” across the western horizon, drastically transforming the night-time environment.

Moreover, the application fails to consider how this lighting will impact visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning given the relevance of dark skies to the area’s identity and the growth of tourism sectors like astro-tourism. Consequently, this lack of assessment leads to a considerable deficiency in the overall evaluation of the landscape and environment.

Equally alarming is the absence of an analysis regarding the effects on nocturnal

wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can cause disorientation and increase the risk of collision. The proposal does not include any assessment of the impacts of lighting or a study on phototaxis, failing to evaluate how aviation lighting might influence these species or escalate mortality rates.

This deficiency is exacerbated by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activities and the 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 addressed. The absence of site-specific night-time data creates a serious void in understanding the ecological consequences.

Without an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites might be negatively affected. The evidential standard needed to demonstrate that there are no adverse effects beyond reasonable scientific doubt is not satisfied, invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, these omissions are at odds with the National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. Furthermore, they undermine a thorough assessment of landscape and seascape impacts since the night-time character is a vital component of the environment.

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

TOURISM

The assessment of tourism impacts within the application is materially deficient, neglecting to evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism, which has seen substantial growth from £65 million in 2017 to over £81.5 million, supports more than 1,000 jobs and accounts for up to 16% of the island's economy, relies fundamentally on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. The application itself acknowledges that 86% of visitors are attracted by scenery, yet it does not provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution to the area.

Moreover, the assessment fails to consider the crucial role of environmental quality in enhancing tourism. It overlooks the significance of unspoiled landscapes and dark skies for the visitor experience and emerging markets, such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, creating a substantial gap in understanding the impacts on this growing aspect of the local economy.

In light of the island community's limited economic diversification, the failure to assess impacts on tourism carries broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated in accordance with the requirements set out in the Islands (Scotland) Act 2018.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4, particularly regarding economic impact and the necessity to show net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector and fails to furnish sufficient evidence for the competent authority to assess the economic consequences of the proposal adequately.

Collectively, the shortcomings in quantifying tourism impacts, assessing environmental drivers of visitor behaviour, and recognising the island's economic dependency lead to a significant evidential gap. This gap hinders a robust evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates significant shortcomings in meeting the principles of sustainable development as outlined by statutory duties and national policy. This application mirrors the key concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. It is now being put forward under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

A reliable evidential foundation for this application is notably absent. There are serious deficiencies in baseline data, the use of an undefined design envelope, unspecified mitigation measures, and the exclusion of critical impact pathways. These include nocturnal wildlife, comprehensive onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is inadequate and fails to provide a full understanding of potential significant effects or residual impacts.

Procedural inadequacies are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to share the complete Social Impact Assessment is a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal contradicts the National Planning Framework 4. It does not adequately protect biodiversity, natural landscapes, or cultural heritage, fails to demonstrate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The overall assessment of cumulative impacts from both offshore and onshore elements is

insufficient, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain uncertain and potentially severe. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit inconsistencies. The requisite evidential standard needed to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

The proposed development would lead to considerable and irreversible alterations to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and the adverse effects on tourism constitute permanent impacts that cannot be mitigated to an acceptable degree.

In light of these factors, the application is fundamentally and procedurally unsuitable for determination. The vast information gaps, along with policy inconsistencies and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority should therefore refuse consent on these bases or invoke relevant regulatory provisions to necessitate the submission of the missing information.

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

Additional Comments

I formally object to this application on the following grounds:

1. Inadequate community engagement - the west Lewis community was not properly consulted prior to site selection or leasing. This fails to meet requirements for early, meaningful public engagement and undermines the principle of community empowerment set out in national planning policy.

2. Failure to assess cultural impacts - the application does not adequately consider the cultural, historical, and linguistic significance of the landscape to the Gaelic community. Impacts on intangible heritage and community wellbeing have not been properly assessed or consulted on.

3. Significant risks to protected wildlife - the development overlaps with important habitats and migratory routes for protected bird species. The environmental assessment does not sufficiently address risks such as collision, displacement, and habitat disruption, raising concerns about compliance with environmental protections.

4. Harm to historic sites and their setting - the proposal would adversely affect the setting and integrity of important scheduled monuments, including the Calanais standing stones, by introducing large-scale industrial development into a sensitive

historic landscape.

5. Unassessed onshore impacts - potential impacts on sensitive onshore environments, including peatland and machair, have not been fully assessed. The proposal also fails to adequately consider the rights of crofters.

6. Damage to tourism and landscape character - the development would industrialise a largely unspoiled coastline and dark sky environment, threatening the natural assets that support the local tourism economy.

7. Strong local opposition - there is clear and substantial opposition from the local community. Approving the project would conflict with national commitments to support island communities in shaping their own futures.

Given these concerns, the proposal risks causing significant and irreversible harm to the environment, cultural heritage, and local economy. I respectfully request that this application be refused.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 4DB8B693

Member of the public 934

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 marine licensing and Environmental Impact Assessment regimes. An analysis of the Environmental Impact Assessment Report and accompanying documents has revealed significant deficiencies related to planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west coast of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, largely untouched environment, and robust cultural identity. The proposal's scale, design, and proximity to the shoreline raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential foundation necessary for a lawful decision. There are substantial gaps in critical environmental data, and the available baseline information is both limited and inconsistent. Additionally, several key components of the proposal remain undefined. The employment of a flexible design framework hinders a comprehensive understanding of the potential significant effects, and the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the provided documentation fails to facilitate a complete understanding of the environmental, cultural, or community impacts, while claims of negligible or non-significant effects are not substantiated by robust evidence.

Substantial policy conflicts are evident in this case. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not adequately demonstrate adherence to national obligations for the protection of biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests necessary for granting consent and hinder the competent authority's ability to ascertain the development's acceptability from a policy perspective.

The unprecedented scale of the proposal, characterised by large turbines situated near the shoreline, introduces considerable concerns regarding landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, dependence on undefined mitigation, evidential shortcomings, and clear non-compliance with policy illustrate that the application is incomplete and unable 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 fundamentally flawed and fails to deliver a comprehensive, clear, or trustworthy account of the anticipated environmental consequences of the proposal. The implementation of a flexible Project Design Envelope, which does not commit to precise turbine dimensions, layouts, or configurations, introduces considerable uncertainty and hinders a consistent evaluation of a worst-case scenario. This lack of clarity undermines the assessment's credibility, preventing both the public and the competent authority from grasping the true scale of environmental impacts.

Furthermore, the application significantly depends on unformulated mitigation measures, monitoring strategies, and management plans. Seeking consent under the premise that environmental damage will be addressed later restricts any substantial appraisal of effectiveness or evaluation of residual impacts. This postponement of essential information to post-consent stages is procedurally inappropriate and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigations are clearly defined prior to decision-making.

Moreover, the assessment contains notable evidential shortcomings, such as insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, particularly in instances where negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainties that fail to meet statutory obligations.

Consequently, the application does not satisfy the evidential standards required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not adequately demonstrate compliance with National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it is unclear whether impacts have been thoroughly assessed or if suitable safeguards exist.

In summary, the reliance on an unspecified design envelope, the absence of clearly defined mitigation measures, and the deficiencies in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings preclude a lawful and rigorous evaluation of environmental effects, placing the competent authority in a position where it cannot adequately assess the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application is fundamentally flawed due to its inadequate assessment of alternatives, which does not comply with the statutory requirements set out by the Environmental Impact Assessment regime. Instead of presenting a structured and reasoned analysis of realistic alternatives based on their environmental effects, the

application opts for a narrative account of the project's development. This method fails to establish whether less harmful options have been properly identified, assessed, and chosen over more damaging ones.

There is a notable lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. The developer has not adequately considered the option of placing turbines further offshore, which would likely reduce visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the critical role of proximity to the shore in determining impact necessitate a thorough analysis that is currently absent. This absence prevents any conclusion that the proposed siting is the least damaging option.

The issues are further compounded by the deficiencies in cable routing and landfall assessment, where there is insufficient evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis indicate that the application has not applied mitigation by design but instead relies on post-design measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and routing of infrastructure. This oversight reflects a failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining if less harmful and more suitable alternatives are available. The lack of a comprehensive alternatives assessment raises serious concerns about whether the proposal is sustainable or compliant with relevant policy.

From a policy standpoint, this inadequacy undermines adherence to National Planning Framework 4, particularly in terms of protecting natural environments, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a significant deficiency that contributes to the overarching conclusion that the application has not been adequately evaluated and should not support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The current application presents significant deficiencies in its assessment of marine ecology and protected species, particularly within the sensitive and biologically active marine environment of West Lewis. The methodologies employed lack the depth required to capture a comprehensive understanding of species presence, behaviour, and habitat use, leading to incomplete baseline data that undermines the reliability of the evaluation of potential impacts.

A notable gap in the assessment pertains to otters, which are classified as a European Protected Species. The application does not adequately recognise their active use of coastal areas for foraging and movement. This oversight means that critical aspects

such as their core foraging range and behavioural patterns have not been appropriately considered, leaving the assessment of potential construction disturbances, noise, and increased activity unexamined. Consequently, the conclusions drawn regarding the absence of significant effects on otters are fundamentally flawed.

Further issues arise in the assessment of basking sharks, where the reliance on aerial surveys introduces a significant detection bias, particularly in Atlantic conditions. This methodological approach risks underestimating the presence of basking sharks, especially when juxtaposed with well-established land-based observations that indicate frequent usage of these waters. The failure to incorporate or adequately consider such data culminates in an incomplete baseline, casting doubt on the reliability of the conclusions reached.

The shortcomings in methodology lead to conclusions of negligible or non-significant effects being based more on assumptions than on robust evidence. Additionally, the lack of sufficient baseline data inhibits a meaningful evaluation of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This generates uncertainty about the true extent of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set out by the Environmental Impact Assessment regime and the National Planning Framework 4, given that protected species have not been sufficiently identified or assessed. The uncertainty introduced by these deficiencies precludes the dismissal of adverse effects with reasonable scientific certainty, thus invoking the precautionary principle. Under these conditions, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions fundamentally undermines the assessment's reliability. These factors obstruct a thorough evaluation of impacts on marine ecology and protected species, reinforcing the argument that the application fails to present a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

There is a fundamental contradiction present within the application itself. While the developer concludes that there will be no significant adverse effects, they simultaneously advance a Habitats Regulations derogation case, which is required only when significant harm is anticipated. This inconsistency raises serious questions about

the reliability of the assessment and suggests that the conclusions drawn are not adequately supported by the underlying evidence.

Moreover, the assessment does not provide sufficient evidence that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully acknowledged, and the reliance on modelling approaches introduces uncertainty, especially for species that are in severe decline, including Kittiwakes and Fulmars. The methodologies employed appear likely to underestimate mortality rates, particularly where baseline data is lacking and behavioural responses are not comprehensively understood.

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

From a regulatory standpoint, the application 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, alongside data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle, thus preventing a lawful conclusion in favour of consent.

The identified deficiencies also represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to 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 inconsistency, methodological weaknesses, and insufficient evidence. These shortcomings hinder a robust evaluation of the impacts, leading to the 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, 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, creating a significant evidential gap that hampers both public understanding and the competent authority's ability to evaluate social risks. Although the developer conducted a Social Impact Assessment and engaged local residents through focus groups, the lack of transparency around the full report prevents proper scrutiny of its findings. Available summaries reveal that residents are facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts, derived from direct engagement, highlight the urgency of the issue but remain inadequately addressed due to the failure to disclose the complete assessment.

Concerns have been raised about the proposal posing a direct threat to community identity and cohesion, with “cultural loss” noted in the developer's findings. However,

these significant impacts have not been fully integrated into the main application or given appropriate consideration. The withholding of the full assessment obscures the true human and social costs associated with the development, undermining the overall transparency required for informed decision-making.

This lack of clarity also undermines the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health impacts is critical for developments of this magnitude. The application's failure to provide complete data means it does not present a sufficient evidential basis for weighing the benefits against the potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing, as it must promote positive health outcomes and avoid adverse effects. The available evidence suggests existing negative impacts that have not been adequately disclosed, making it impossible to ascertain compliance with this policy without the full assessment.

The procedural ramifications are considerable. Without access to the complete Social Impact Assessment, the competent authority cannot perform a thorough socio-economic and health evaluation. This omission represents a material failure to meet the evidential requirements set forth by the Environmental Impact Assessment framework. Overall, the non-disclosure of the full Social Impact Assessment, paired with evidence of existing adverse impacts, results in an incomplete and unreliable assessment, hindering lawful determination and underscoring the inadequacy of the information supporting the application.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The proposal for large-scale turbines near the shoreline poses significant concerns as it would result in a continuous industrial presence, fundamentally transforming the landscape in a permanent and irreversible manner.

The application fails to adequately assess the scale of the visual changes that would occur. The proximity of the turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations, which would adversely affect visual amenity and compromise the defining qualities of naturalness and remoteness. The current assessment does not effectively capture the extent of this impact or its significance within such a sensitive landscape.

Methodological issues arise from the selection and presentation of visual viewpoints within the assessment. It appears that the viewpoints chosen may not fully represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and landscapes of high value. This raises concerns that the visual impacts may have been understated, thus diminishing the reliability of the overall assessment.

Moreover, the application overlooks the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are linked to their wider landscape context through visual and spatial relationships with the Atlantic horizon. The assessment inadequately considers these connections, treating these assets as isolated entities, which results in an incomplete evaluation of their cultural significance and setting.

The introduction of industrial elements into the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their ties to the natural horizon. This transformation constitutes not only a visual detriment but also a broader cultural and spatial harm that has not been sufficiently addressed in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 concerning the safeguarding of natural places and historic assets. The proposed scale of change is at odds with the mandate to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further undermines any assertion of compliance with policy requirements.

It is evident that the impacts associated with this proposal are unlikely to be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be imposing and unavoidable. Consequently, the resulting changes would be fundamental and permanent, rather than amenable to acceptable levels of reduction through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is characterised by clean coastal waters and important habitats that are particularly sensitive to sediment disturbance and contamination. The application acknowledges the presence of risks such as sediment mobilisation and accidental chemical or oil spills; however, it lacks sufficient detail on preventative, control, or monitoring measures for these risks. The assessment of construction and pollution risks associated with the proposal is incomplete, failing to provide the necessary detail to evaluate the likely environmental effects adequately.

The proposal involves substantial seabed preparation and installation works within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that will be formulated post-consent, which

undermines any meaningful assessment of their adequacy or effectiveness. This reliance on undefined future measures raises significant concerns given the sensitivity of the receiving environment.

Furthermore, there is uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, the extent, duration, or ecological effects of these impacts cannot be determined. This uncertainty also extends to potential effects on marine species and habitats already identified as sensitive within the wider assessment.

The absence of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent stage, the application obstructs the ability to evaluate whether appropriate safeguards are in place to address pollution events. Such a deferral introduces procedural risk and undermines the capability of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the failure to provide critical environmental safeguards is in conflict with the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation measures are assessed before consent is granted; without this information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the combination of undefined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts renders the assessment materially deficient. These shortcomings significantly hinder a robust evaluation of construction and pollution risks and further support the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application lacks a thorough assessment of fisheries and marine life, resulting in an inadequate evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry, yet the proposal does not provide assurance that these vital habitats and activities can be preserved without causing significant disruption.

A critical concern is the presumption that fishing operations can be relocated without any adverse effects. The application fails to supply evidence that alternative fishing areas are not only available but also accessible and able to accommodate additional fishing pressure. This gap in information is crucial, as the risk of overfishing in other regions could have wider economic ramifications for the local fishing fleet. The absence of a clear, evidence-based assessment means the impacts on fisheries and local livelihoods remain obscured.

Moreover, the project poses considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The extended high-energy hammer piling is anticipated to disturb marine life over significant distances, including local dolphin populations. Concerns about the potential impact on a large portion of the bottlenose dolphin community have been raised, yet the application downplays these effects without adequate supporting evidence.

There is a marked contradiction within the application, acknowledging the necessity for licenses to permit harm to European Protected Species while simultaneously categorising the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises serious questions about adherence to the Habitats Regulations, especially where anticipated harm necessitates legal clearance.

Additionally, the assessment neglects to consider cumulative impacts resulting from various pressures such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a comprehensive evaluation of these interconnected effects, the overall repercussions for marine ecosystems and socio-economic conditions cannot be accurately assessed.

From a policy standpoint, the proposal fails to demonstrate alignment 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 avert unacceptable impacts on marine biodiversity, which prevents any conclusion that the proposal signifies sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure associated with this project is significantly incomplete. It fails to take into account the interconnected nature of the offshore turbines and the onshore works. This separate assessment leads to a fragmented understanding of the true environmental and socio-economic impacts of the entire project.

Onshore elements involve the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. Excavation in areas of deep peat, particularly within Barvas Moor, is particularly concerning as it is a crucial carbon store and an 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 not assessing the onshore impacts adequately, the application obstructs a proper

evaluation of cumulative effects. The Environmental Impact Assessment process requires a comprehensive consideration of all project components, but the separation of offshore and onshore works prevents a full understanding of their combined effects on peatlands, habitats, and local communities.

There are notable risks to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application does not show that these impacts have been fully evaluated or that appropriate measures to avoid them have been put in place, highlighting a significant gap in biodiversity protection.

Additionally, the disturbance of peatland poses a risk to carbon balance as it releases stored carbon, which could create a carbon debt and contradict the aims of renewable energy development. The application falls short in addressing this critical issue and fails to demonstrate that the overall carbon balance will remain positive.

The routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is no evidence presented that necessary consents or processes have been initiated, leading to concerns about the deliverability and legality of the proposed works.

From a policy standpoint, the failure to assess the project as a unified entity, alongside the lack of demonstrated protection for peatlands, habitats, and land use interests, conflicts with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application.

Overall, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts contribute to an incomplete and unreliable application, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife represents a significant gap within the Environmental Impact Assessment. The exceptional darkness of the West Lewis coastline is a crucial aspect of its environmental quality, cultural identity, and tourism potential. The proposed installation of permanent red aviation lighting, which would be visible over extensive distances, threatens to create an intrusive “wall of light” across the western horizon, fundamentally changing the night-time landscape.

Additionally, the application lacks any evaluation of how this lighting may impact visual amenity, landscape character, or the experiences of both residents and visitors. Given the essential role that dark skies play in the region’s identity and in emerging tourism sectors such as astro-tourism, this failure to address lighting impacts is particularly concerning. The resulting absence in the overall landscape and environmental assessment is marked.

Moreover, the proposal neglects to evaluate its effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting due to phototaxis, leading to potential disorientation and heightened risks of collision. The absence of a lighting impact assessment or a phototaxis study means the proposal does not properly consider how aviation lighting could adversely affect these species or contribute to increased mortality rates.

This lack of evaluation is exacerbated by reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal behaviours and the associated risks. Other species, such as Kittiwakes, which may forage or migrate during night hours, are equally susceptible to the disorienting effects of artificial lighting. Without site-specific data collected during night-time hours, there exists a critical gap in understanding the ecological impacts of the proposal.

It is impossible to ascertain whether any protected species or designated sites would suffer adverse effects in the absence of a thorough assessment of nocturnal impacts. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt is not met, thereby invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contravenes National Planning Framework 4, which emphasises the protection of natural environments and the maintenance of environmental quality. Furthermore, it diminishes the overall assessment of landscape and seascape impacts, as the character of night-time environments is vital to the broader ecological context.

In summary, the complete lack of evaluation regarding dark skies and nocturnal wildlife leads to a substantial evidential deficiency. The omission of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of substantiating a lawful decision.

TOURISM

The application has significant deficiencies in assessing tourism impacts, failing to evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. In an area where tourism relies heavily on its wild coastline, near-pristine landscapes, dark skies, and sense of remoteness, this oversight is critical. The application acknowledges that 86% of visitors are attracted by the scenery but does not provide any quantified assessment of how large-scale offshore infrastructure may influence visitor numbers, behaviour, or overall economic contributions.

Tourism on the Isle of Lewis has seen considerable growth, escalating from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application neglects to model the effects of seascape industrialisation and loss of environmental quality on Tourism

Gross Value Added and broader economic resilience. Without this analysis, it remains unclear whether the development will yield a net economic benefit or jeopardise a well-established and expanding sector.

Furthermore, the assessment fails to recognise the significance of environmental quality in enhancing tourism, including the vital role of unspoiled landscapes and dark skies in shaping visitor experiences and supporting emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortfall, leading to a critical gap in understanding the implications for a recognised and growing segment of the local economy.

In an island community that has limited economic diversification, the failure to assess tourism impacts has broader ramifications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been adequately evaluated, contrary to the requirements of the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, especially regarding economic impact and the necessity to show net benefit. It contradicts strategic objectives that designate tourism as a priority growth sector and fails to provide 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 leads to a significant evidential gap. This hinders a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm 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

This development is wrong on many counts. The Council incorrectly assuming that it was popular, when they didn't really consult before opening the door to N4 a few years ago. The Crown Estate who sold the sea bed rights (too cheaply as well) have contributed to this flawed plan.
The 12 categories are concerns I have, and whilst I agree the UK should harness the wind power energy, it should be with appropriate technology and not so close to the west coast of the outer Hebrides with fixed turbines. The damage caused installing these is irreparable and the impact on marine and bird life not properly assessed. Then there is the knock on impact to the fishing industry, pollution risks from oil Spillage, the impact on the landscape, way of life, culture and social division, tourism, way of life, and the list goes on. The land based construction threatens peat banks, one of the most efficient storehouses of greenhouse gasses and pressure on the island

infrastructure, that would get worse over a wider area in this scheme gets the green light, paving an easier path for further off shore projects.
Impact on our dark skies will be awful and the mental health of many will be impacted negatively.
I have read that no other development on this scale has been approved anywhere in the UK, so why here? It seems our 1 constituency outer Hebrides island chain, with a total population of 27/28k people is seen as a pushover. Well, we are not. To add insult to injury the community development £ is paltry compare to the profits for N4. In Canada, If one of their developments is on land owned by First Nations/indigenous people, the people are given a 49% stake in the development.
We do not want this off shore windfarm & associated onshore upheaval, full stop. But if it does get forced upon us then the islands should get a bigger share and some ownership.
This the first plan submitted, take the current N4 plan off the table, and site it out beyond the Flannan isles if research considers it better for the environment & living creature, using newer, floating turbines.
But NOT right in the faces of our outer Hebridean community.

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: ECC84BBC

Member of the public 935

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 application is fundamentally flawed due to its reliance on an undefined Project Design Envelope, which lacks specific commitments regarding turbine dimensions, layouts, or configurations. This introduces substantial uncertainty that hinders the application of a worst-case scenario analysis. Consequently, the integrity of the Environmental Impact Assessment Report is compromised, failing to accurately reflect

the potential environmental impacts of the proposed development. As a result, both the public and the competent authority are left without a clear understanding of the actual extent of these impacts.

Furthermore, the application depends heavily on unestablished mitigation measures, monitoring strategies, and management plans. This approach seeks consent under the premise that any environmental harm will be addressed at a later date, thereby obstructing a thorough evaluation of the effectiveness of such measures and the assessment of any residual impacts. The deferral of critical information to post-consent stages is procedurally unacceptable, contradicting the fundamental aims of the Environmental Impact Assessment framework, which mandates that significant effects and corresponding mitigation strategies be clearly delineated prior to the determination of applications.

Significant evidential deficiencies are evident, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This situation gives rise to uncertainty regarding both the scale and significance of the impacts, particularly in cases where conclusions of negligible or non-significant effects are asserted without adequate supporting data. Such a lack of sufficient information obstructs a clear comprehension of cumulative and worst-case impacts, thereby introducing a degree of scientific uncertainty that cannot be aligned with statutory requirements.

As a result, the application fails to satisfy the evidential standards necessitated by the Habitats Regulations, particularly regarding the exclusion of adverse effects beyond reasonable scientific doubt. This situation necessitates the invocation of the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been fully assessed or that adequate safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is critically flawed, providing neither a complete nor reliable understanding of the ecological receptors within the West Lewis coastal environment. This marine system is highly sensitive and biologically active; however, the baseline data presented is incomplete, and the methodologies used do not effectively capture species presence, behaviour, and habitat use. Consequently, the assessment fails to offer a robust evidential basis for

evaluating impacts.

One significant shortcoming pertains to otters, classified as a European Protected Species, as the application neglects to adequately recognise and assess their active use of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity have not been sufficiently evaluated. This oversight undermines any conclusions that suggest there are no significant effects on this species.

Additional deficiencies become evident in the evaluation of basking sharks, where reliance on aerial surveys introduces a substantial detection bias, particularly in Atlantic conditions. This method is likely to lead to an underestimation of their presence, especially in contrast to established land-based observations that indicate frequent use of these waters. The failure to consider or incorporate such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings mean that any conclusions asserting negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data also obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty about the actual risks 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 it has failed to properly identify or assess protected species. The uncertainty introduced by this lack of thorough evaluation prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these conditions, the granting of consent cannot be justified legally.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the ornithological impacts associated with this development is fundamentally flawed. There are significant gaps in the evidence provided, as well as internal inconsistencies that undermine the validity of its conclusions. The proposal is situated within key foraging areas and migratory pathways along the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected.

A notable contradiction within the application arises from the developer's conclusion of no significant adverse effects, while simultaneously putting forth a Habitats Regulations derogation case. This derogation is only necessary when significant harm is anticipated, raising questions about the reliability of the assessment and suggesting that its conclusions lack robust evidence. Furthermore, the assessment fails to adequately establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unharmed. The crucial feeding grounds associated with these species are not fully taken into account, and the reliance on modelling approaches introduces additional uncertainty, particularly concerning species that are severely declining, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially in instances where baseline data is incomplete and the behavioural responses of the birds are not thoroughly understood.

The placement of turbines within a recognised migratory corridor adds a significant risk, potentially creating a barrier in a primary flight path that is used 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 meet the evidential standards needed to conclude that there will be no adverse effects 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 beyond reasonable scientific doubt has not been attained. This situation engages the precautionary principle and obstructs a lawful conclusion that would support consent.

Additionally, the deficiencies identified suggest a non-compliance with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be negatively affected places the proposal at odds with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the cultural heritage and community identity associated with the proposed development is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are interconnected. This application adopts a reductive perspective, viewing heritage merely as a collection of isolated, static assets and neglecting their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming of the assessment is its treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve

as active sites for burial and spiritual practices, yet they are categorised as static features in the assessment. This oversight neglects their continued significance and the potential impacts of development on their surroundings, leading to an incomplete evaluation of the cultural effects and disregarding their importance in community life.

Moreover, the assessment overlooks intangible cultural heritage, particularly the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are vital to the area's identity but are entirely absent from the evaluation, representing a considerable omission. The failure to consider such factors hinders a comprehensive understanding of the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity recognised as characteristic of an Indigenous People, yet there has been no process for Free, Prior and Informed Consent. This lack of meaningful engagement diminishes the legitimacy of the assessment and fails to adhere to established principles of participation in decisions affecting cultural and environmental interests.

Furthermore, a critical procedural failure is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority is unable to fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community. This alone obstructs a lawful determination of the proposal.

From a policy standpoint, the noted deficiencies place the proposal in direct opposition to National Planning Framework 4, particularly concerning the protection of historic assets and locations. The failure to account for both tangible and intangible heritage, as well as to recognise living cultural practices, constitutes a clear deviation from policy requirements.

In summation, the combined failures to assess living heritage, intangible cultural value, community rights, and statutory obligations result in a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application does not furnish a sufficient foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of a complete Social Impact Assessment critically undermines the evaluation of social impacts, health, and wellbeing associated with the development proposal. While a Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, the absence of the full report introduces a significant evidential gap. This gap prevents both the public and the competent authority from understanding the breadth of social risks highlighted in 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 proposed development. These impacts are based on direct engagement with the community and are not speculative in nature. However, the failure to disclose the complete assessment limits the opportunity for proper scrutiny of the findings, which in turn affects their significance within the decision-making process.

Moreover, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's own findings. Despite this recognition, these impacts have not been adequately incorporated into the primary application nor given the necessary weight. The withholding of the full Social Impact Assessment conceals the true human and social costs of the proposed development.

This lack of transparency further complicates the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is vital for developments of this magnitude, especially when they could potentially alter community character and function. By failing to provide the complete dataset, the application lacks a robust evidential basis needed to balance benefits against potential harms.

From a policy standpoint, the application falls short of demonstrating adherence to National Planning Framework 4 regarding health and wellbeing. Developments are required to promote positive health outcomes and avoid causing harm, yet the existing evidence points to adverse effects that have not been fully revealed. Without the complete assessment, it is impossible to ascertain compliance with this policy.

The procedural ramifications are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a material omission within the application and indicates a failure to meet the evidential standards set by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The 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 exhibits significant deficiencies regarding the assessment of construction and pollution risks, which ultimately hampers a thorough evaluation of potential

environmental effects. This application involves considerable seabed preparation and installation in a challenging Atlantic environment. However, it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be developed after consent has been granted, thereby obstructing any meaningful appraisal of their adequacy or effectiveness.

The application acknowledges risks associated with sediment mobilisation and potential chemical or oil spills, yet it fails to furnish adequate details on how these risks will be prevented, controlled, or monitored. This lack of clarity is especially alarming in light of the sensitive nature of the receiving environment, particularly the West Lewis coastline, which is home to clean coastal waters and significant habitats vulnerable to sediment disturbance and contamination.

Furthermore, uncertainty remains regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological repercussions of these effects. This uncertainty extends to the potential impacts on marine species and habitats identified as sensitive in the broader assessment.

The absence of specific emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application effectively inhibits an evaluation of whether adequate safeguards are in place to manage pollution incidents. This creates procedural risks and compromises the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contravenes the Environmental Impact Assessment regime requirements. Prior to consent, it is necessary to assess likely significant effects and related mitigations, and a lawful determination cannot be achieved in the absence of such information. Additionally, the application does not demonstrate compliance with policy obligations concerning environmental protection and water quality.

In summary, the incomplete assessment arising from the lack of defined mitigation measures, absence of detailed management plans, and uncertainty regarding potential impacts renders the overall evaluation of construction and pollution risks materially deficient. These failings underscore the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry, yet the application does not adequately evaluate the ecological or socio-economic impacts of the proposal. A critical concern lies in the assumption that fishing activity can be displaced without consequences, with no evidence provided to support the availability or accessibility of alternative fishing grounds capable of sustaining additional pressure. This lack of information is significant, as it poses risks of

overfishing elsewhere and could have wider economic repercussions for the local fishing fleet. Without a well-supported assessment, the impacts on fisheries and local livelihoods remain poorly understood.

Furthermore, the proposal carries considerable risks for marine species, notably due to the underwater noise resulting from construction activities. The extended use of high-energy hammer piling is expected to cause disturbances over large distances, affecting species such as dolphins. The potential impact on a substantial portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these effects without adequate supporting evidence.

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The 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 absence of an assessment concerning dark skies and nocturnal wildlife is a critical shortcoming in the Environmental Impact Assessment. The West Lewis coastline is defined by its exceptionally dark skies, which play a vital role in environmental quality, cultural identity, and tourism value. The introduction of permanent red aviation lighting, which will be visible over long distances, is set to create a constant and intrusive “wall of light” across the western horizon, fundamentally disrupting the natural night-time environment.

Furthermore, the application fails to evaluate how this lighting will affect visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly significant in light of the value dark skies hold for the region’s identity and the growing sector of astro-tourism. The lack of consideration for these impacts marks

a considerable gap in the overall landscape and environmental assessment.

Of even greater concern is the lack of evaluation regarding the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial lighting, which can cause disorientation and increase the risk of collisions. The application does not provide any lighting impact assessment or a phototaxis study, failing to determine how aviation lighting may impact these species or contribute to increased mortality rates.

This issue is further compounded by the dependence on daytime survey data within the ornithological assessment, which fails to account for nocturnal activities or associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this risk remains unassessed. The lack of site-specific night-time data creates a significant deficiency in understanding the ecological impacts.

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

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

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

TOURISM

The application fails to adequately assess the tourism impacts, which are crucial for the economy of the Isle of Lewis. It overlooks the economic and social consequences that affect a key sector. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Although the application states that 86% of visitors are attracted by scenery, it does not provide a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contributions.

Tourism has seen significant growth, rising from £65 million in 2017 to over £81.5 million. It supports more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the application neglects to model how the potential industrialisation of the seascape and a decline in environmental quality could affect Tourism Gross Value Added and the broader economic resilience. Without such analysis, it is impossible to ascertain whether the proposed development would yield a

net economic benefit or harm an established and expanding sector.

Additionally, the assessment does not address the importance of environmental quality for tourism. It fails to recognise how unspoiled landscapes and dark skies enhance visitor experience and support emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a significant gap in understanding the impacts on a growing segment of the local economy.

In an island community that has limited economic diversification, the neglect to assess tourism impacts carries broader implications for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly evaluated, as required by 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 illustrate net benefit. It conflicts with strategic objectives that recognise tourism as a priority growth sector. Furthermore, it fails to provide adequate evidence for the competent authority to evaluate the economic consequences of the proposal.

Overall, the lack of quantification regarding tourism impacts, the failure to assess environmental drivers of visitor behaviour, and the consideration of the island's economic dependency result in a substantial evidential gap. This gap hinders a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development as defined by statutory duties, national policy, and evidential standards. It mirrors the critical issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This current application, however, is presented within a more stringent policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Significant gaps in the evidential basis for the application hinder its determination. The reliance on an undefined design envelope, unspecified mitigation measures, and the failure to address key impact pathways—including effects on nocturnal wildlife, complete onshore infrastructure, and tourism—renders the Environmental Impact Assessment incomplete. Consequently, it does not provide a full understanding of likely significant effects or residual impacts.

Moreover, there are procedural shortcomings present. The failure to conduct a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018. Additionally, the lack of a full Social Impact

Assessment constitutes a significant omission, preventing the competent authority from evaluating effects on community wellbeing, cultural identity, and economic resilience. These deficiencies are substantial enough to render the application unfit for determination.

The proposal is also at odds with National Planning Framework 4, failing to safeguard biodiversity, natural landscapes, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit, particularly due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been adequately assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals, coupled with internal inconsistencies, have not met the evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle and hinders the ability to lawfully conclude that the impacts are acceptable.

The proposal is poised to cause substantial and irreversible changes to a highly sensitive landscape. It threatens to industrialise the Atlantic-facing coastline, disrupt dark skies, alter cultural and visual relationships, and negatively impact tourism, resulting in permanent effects that cannot be mitigated satisfactorily.

In summary, the application is both procedurally and substantively unfit for determination. The scale of deficiencies in information, along with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority is urged to refuse consent on these grounds or to invoke appropriate regulatory provisions to obtain the necessary missing information.

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

Additional Comments

I moved here for the wild open spaces, quiet and feeling of safety. I am extremely sensitive to noise and get easily overwhelmed. I have already been impacted by a low frequency noise for over a year that has had a huge impact on my mental and physical wellbeing. I find great solace walking along the shore and the sight and sound of huge offshore turbines will be extremely detrimental not only due their visual impact but also infrasound. The unspoilt nature is truly unique and special to the culture and consequent tourism. The dark skies are truly breathtaking. The impact of an experimental offshore wind farm on the ecology and those of us who live here. We pay more than anyone for power and I don’t see any incentive to lower our costs. The island has been taken advantage of through the centuries with land clearances and it’s now time for us to make a stand against further exploitation.

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: BF9E53DE

Member of the public 936

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 existing documentation highlights significant deficiencies in planning, environmental considerations, cultural factors, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, a region celebrated for its Atlantic-facing coastline, near-pristine natural environment, and rich cultural identity. Concerns arise regarding the compatibility of the project's scale, proximity, and design with statutory requirements, national policy, and the principles of sustainable development.

There is a lack of adequate evidential basis for a lawful determination within the application. Critical environmental data is absent, baseline information is both limited and inconsistent, and several key components of the proposal remain undefined. The application's reliance on a flexible design framework obstructs a clear understanding of potential significant effects. Furthermore, the dependency on unspecified mitigation measures means their effectiveness cannot be properly evaluated. Consequently, the documentation falls short of enabling a comprehensive or informed understanding of environmental, cultural, or community impacts, while assertions of negligible or non-significant effects lack robust evidence.

Substantial policy conflicts are evident. The proposal appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly undermine the statutory tests necessary for consent and weaken the capacity of the competent authority to determine that the development meets acceptable policy standards.

The scale of the proposed project is unprecedented in this area, with large turbines planned in close proximity to the shoreline. This raises serious concerns regarding landscape capacity, visual dominance, and environmental impact. In light of the insufficient information, the reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. In such circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The 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 of marine ecology and protected species associated with the application is critically flawed and fails to deliver a thorough understanding of ecological receptors in the West Lewis coastal environment. This area is known for its biological activity and sensitivity, yet the existing baseline data is inadequate, and the methodologies employed do not effectively capture species presence, behaviour, or habitat use. Consequently, the assessment lacks a reliable evidential basis necessary for evaluating potential impacts.

One major gap is the consideration of otters, which are a European Protected Species.

The application does not adequately acknowledge or assess their active foraging and movement within coastal regions. By overlooking their core foraging range and behavioural patterns, the assessment neglects to evaluate the potential effects of construction-related disturbances, noise, and increased human activity. This deficiency undermines any conclusions drawn regarding the absence of significant effects on otters.

Moreover, the assessment's evaluation of basking sharks is similarly deficient, relying on aerial surveys that introduce considerable detection bias, particularly in Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared with established land-based observations that indicate regular use of these waters. The failure to incorporate or adequately consider such critical data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings result in assessments of negligible or non-significant effects that are based more on assumptions than on robust evidence. The lack of sufficient baseline data hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty about the actual risks to marine species and habitats.

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

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions renders the assessment fundamentally unreliable. These serious deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, culminating in the assertion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development lacks reliability due to significant internal inconsistencies and methodological weaknesses. It fails to meet the necessary evidential threshold to confirm that the integrity of protected sites will remain unaffected. Notably, the west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing decline. Despite this, the application does not adequately demonstrate that these species will not suffer adverse effects, particularly given its location within key foraging areas and migratory pathways.

Moreover, the application presents a fundamental contradiction: while the developer asserts there will be no significant adverse effects, they simultaneously present a

Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises doubts about the validity of the assessment and suggests that its conclusions lack robust support from the evidence provided.

The assessment overlooks essential evidence regarding seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda. It fails to fully consider the importance of these feeding grounds and relies on modelling approaches that introduce uncertainty. This is especially problematic for species like Kittiwakes and Fulmars, which are in severe decline, as the methodologies used may underestimate mortality rates due to incomplete baseline data and insufficient understanding of behavioural responses.

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

Collectively, the gaps in data, contradictory conclusions, and limitations in modelling mean that the standard of proof required to eliminate reasonable scientific doubt has not been met. This situation invokes the precautionary principle, preventing a lawful conclusion in favour of consent. Furthermore, the deficiencies identified in the assessment represent a failure to adhere to the National Planning Framework 4, which mandates biodiversity protection and the safeguarding of natural assets. Consequently, the inability to prove that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In summary, these shortcomings contribute to the conclusion that the application fails to meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity, particularly regarding the West Lewis coastline, which is a vibrant cultural landscape where environment, language, tradition, and community are interconnected. The application adopts a simplistic view, treating heritage as isolated, static features rather than acknowledging their ongoing social, cultural, and spiritual significance within the community.

There is a notable deficiency in the treatment of culturally significant sites, specifically the active burial grounds at Dalmore, Bragar, and Barvas. These places serve as essential locations for burial and spiritual practice, yet the assessment considers them as static elements, neglecting their ongoing use and the implications of development on their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural impacts and overlooks their vital role in community life.

Moreover, the application neglects to evaluate intangible cultural heritage, such as the

Gaelic language and local traditions, which are integral to the area's identity. This significant omission hampers the understanding of the cultural impact of the development. The lack of assessment of these vital cultural elements further diminishes the validity of the evaluation.

Concerns also arise regarding community rights and engagement, particularly for the Gaelic-speaking population, which embodies a distinct cultural identity characteristic of an Indigenous People. The absence of a Free, Prior and Informed Consent process undermines the integrity of the assessment, failing to meet established principles of community participation in decisions that affect cultural and environmental interests.

A critical procedural failure is the lack of a compliant Island Communities Impact Assessment, a legal requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community, rendering a lawful determination impossible.

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

In summary, the failure to assess living heritage, intangible cultural values, community rights, and statutory obligations leads to a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not furnish a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment represents a critical flaw in the evaluation process. The developer has conducted focus groups with local residents; however, the full report remains unpublished. This omission creates a significant evidential gap that hinders both public understanding and the competent authority's ability to assess the potential social risks identified in the developer’s own research.

Summaries that are available reveal that local residents are already facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement and are not merely speculative in nature. Nevertheless, without access to the complete assessment, proper scrutiny of these findings is compromised, limiting the opportunity to evaluate their significance in the decision-making process.

Moreover, the proposal has been perceived as a direct threat to community identity and cohesion, with the developer’s own findings indicating a concern for “cultural loss.”

However, these serious impacts have not been adequately incorporated into the main application or given the necessary weight in the evaluation process. The withholding of the full Social Impact Assessment obscures the real human and social costs associated with the development.

This deficiency in transparency has broader implications for the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. The failure to provide the complete dataset limits the application's ability to present a thorough evidential basis for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to foster positive health outcomes and mitigate harm. However, the evidence suggests that adverse effects already exist and have not been fully disclosed. Without the full assessment, it is impossible to demonstrate adherence to this policy.

The procedural consequences are considerable. The competent authority is unable to perform a rigorous socio-economic and health evaluation without access to the full Social Impact Assessment. This constitutes a material omission within the application and signifies a failure to meet the evidential standards set by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

The application fails to accurately depict the scale of the visual change. Given the dimensions and proximity of the turbines, they are positioned to dominate views from residential areas, historic sites, and frequently visited coastal locations. This dominance would adversely affect visual amenity and diminish the key attributes of naturalness and remoteness. The assessment does not adequately communicate the significance of this impact within the context of such a sensitive landscape.

Methodological issues arise from the selection and presentation of visual viewpoints.

There is evidence to suggest that the chosen viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, especially in relation to important cultural heritage sites and high-value landscapes. Such a limitation raises concerns that the true scale of visual impact may be understated, thereby compromising the credibility of the assessment.

Moreover, there is a notable deficiency in the evaluation of the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting that connects them visually and spatially to the Atlantic horizon. The assessment treats these sites as isolated entities, failing to acknowledge their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural significance.

The potential 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 poses not only a visual impact but also a more extensive cultural and spatial detriment that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly regarding the preservation of natural places and historic assets. The extent of the proposed changes is incompatible with the obligation to protect landscape character, visual amenity, and the setting of culturally important sites. The lack of a comprehensive worst-case assessment further diminishes 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 result in a presence that is dominant and unavoidable. Consequently, the change is fundamental and permanent, incapable of being reduced to an acceptable level through mitigation measures.

In conclusion, the assessment fails to accurately portray the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and confirm that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment concerning construction and pollution risks is inadequate and lacks the necessary detail to evaluate the likely environmental effects. This proposal entails significant seabed preparation and installation works in a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application leans on mitigation and contingency measures that are to be defined after consent has been granted, which hinders any meaningful assessment of their sufficiency or effectiveness.

Particularly alarming is the reliance on vague future measures 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. While the application acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide adequate details on how these issues will be prevented, controlled, or monitored.

There is also a lack of clarity concerning the scale and behaviour of sediment plumes that could arise from 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 impacts of these disturbances. This uncertainty also encompasses potential effects on marine species and habitats that have been recognised as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent stage, the application impedes the evaluation of whether adequate safeguards exist to address pollution events. This introduces procedural risks and weakens the ability of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory viewpoint, the postponement of essential environmental safeguards contradicts the requirements set out by the Environmental Impact Assessment regime. It is necessary to assess likely significant effects and proposed mitigation prior to granting consent; when such information is absent, a lawful determination cannot occur. Moreover, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Collectively, the lack of defined mitigation measures, insufficient management plans, and uncertainty regarding potential impacts result in a materially deficient assessment. These deficiencies impede a thorough evaluation of construction and pollution risks and reinforce the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding the protection of marine species, particularly in relation to the underwater noise that will be generated during construction. The anticipated high-energy hammer piling could cause disturbances over considerable distances, with potential impacts on species such as dolphins. The predicted disturbance to a significant proportion of the local bottlenose dolphin population is alarming. However, the application appears to minimise the importance of these effects, lacking sufficient supporting evidence to justify such an oversight.

Moreover, the assessment of fisheries and marine life is inadequate, failing to provide a thorough evaluation of the ecological and socio-economic impacts. The waters off the West Lewis coast are home to both a vibrant marine ecosystem and a thriving fishing industry. Nevertheless, the application does not adequately demonstrate that these

vital uses and habitats can be safeguarded from significant disruption.

A key concern lies in the assumption made by the applicant that fishing activity can be displaced without any repercussions. There is a notable absence of evidence indicating that alternative fishing grounds are available, accessible, or capable of accommodating additional pressure. This lack of information is particularly concerning, as displacement could lead to overfishing in other areas and may have broader economic ramifications for the local fishing fleet. The absence of a clear and evidence-based assessment means that the potential impacts on fisheries and local livelihoods remain poorly understood.

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

There are also discrepancies within the application regarding the need for licences to allow harm to European Protected Species. While the application acknowledges this requirement, it simultaneously describes potential impacts as negligible. This contradiction diminishes the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal includes significant infrastructure developments, such as cabling across protected moorland, the construction of a substation near Stornoway, and the creation of access routes through sensitive landscapes. Notably, these onshore works involve excavation across areas of deep peat, particularly within Barvas Moor, which serves as an important carbon store and ecologically sensitive habitat. However, the application fails to offer a comprehensive assessment of these impacts, which is essential for understanding the project's overall environmental footprint.

There are considerable risks posed to sensitive habitats, including machair systems and peatland environments that benefit from policy protection. The lack of a thorough

assessment of impacts on these habitats raises concerns about biodiversity protection and demonstrates a clear evidential gap. Additionally, the disturbance of peatland resulting from the project could lead to a release of stored carbon, potentially creating a carbon debt that contradicts the renewable energy objectives. The application does not adequately tackle this issue or show that the overall carbon balance will remain beneficial.

The assessment of onshore infrastructure is notably incomplete, and the separate evaluation of offshore turbines and onshore works leads to a fragmented approach, obscuring the true scale of environmental and socio-economic effects. By not assessing all project components together, the application prevents a proper evaluation of cumulative impacts, leaving the combined effects on peatlands, habitats, and local communities inadequately understood.

Furthermore, routing the infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is a lack of evidence that the necessary consents or processes have been initiated, raising significant questions about the deliverability and lawful implementation of the project.

From a policy perspective, the failure to assess the project as a cohesive whole and to demonstrate 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 show that impacts can be avoided or mitigated further undermines the credibility of the application. Taken together, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts make this portion of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is characterised by exceptionally dark skies, which are crucial for environmental quality, cultural identity, and the tourism sector. However, the Environmental Impact Assessment completely omits the assessment of dark skies and nocturnal wildlife, representing a significant gap. The proposal includes permanent red aviation lighting, which would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

This application does not address the impacts of the proposed lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the importance of dark skies to the area's identity and the emerging sector of astro-tourism, this lack of assessment is particularly concerning. Furthermore, there is no evaluation of how this lighting may affect 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 result in disorientation and increased collision risks. The absence of a lighting impact assessment or phototaxis study fails to address these crucial effects.

The reliance on daytime survey data in the ornithological assessment further complicates the matter, as it does not capture nocturnal activity or its associated risks. Species like Kittiwakes, which might forage or migrate at night, are vulnerable to disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

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

From a policy standpoint, this omission contradicts National Planning Framework 4, which pertains to the protection of natural places and environmental quality. It undermines the broader assessment of landscape and seascape impacts since night-time character is an integral part of the environment.

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

TOURISM

The failure to adequately assess the impacts on tourism represents a significant oversight, particularly given the importance of this sector to the Isle of Lewis's economy. Tourism thrives on the region's stunning coastline, largely untouched landscape, dark skies, and sense of remoteness. Despite the application indicating that 86% of visitors are attracted by the scenery, it lacks a thorough evaluation of how large-scale offshore infrastructure could potentially influence visitor numbers, behaviours, and the overall economic contribution of tourism.

This sector has seen remarkable growth, expanding from £65 million in 2017 to over £81.5 million, and it supports more than 1,000 jobs, representing up to 16% of the island's economy. However, the application does not consider how the industrialisation of the seascape and subsequent decline in environmental quality might affect Tourism Gross Value Added or the broader economic resilience of the island. Without a comprehensive analysis, it remains unclear if the proposed development would bring a net economic advantage or jeopardise this vital and growing sector.

Moreover, the assessment overlooks the crucial role that environmental quality plays in supporting tourism. The significance of unspoiled landscapes and dark skies to the visitor experience is particularly pertinent, especially for emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment only exacerbates this shortcoming, resulting in a critical gap in understanding the impacts on an increasingly recognised segment of the local economy.

For a community that relies heavily on tourism and has limited economic diversification, the neglect of tourism impact assessments has far-reaching consequences for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment further means that these economic vulnerabilities have not been properly evaluated, as required by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially concerning economic impact and the necessity of showing net benefits. It contradicts strategic objectives that prioritise tourism as a growth sector and fails to supply sufficient evidence for the competent authority to gauge the economic implications of the proposal.

In summary, the collective failures to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and acknowledge the island's economic dependence result in a significant evidential gap. This gap undermines a robust evaluation of the economic consequences, leading to the conclusion that the application remains incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the necessary criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application mirrors the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasises the importance of biodiversity, peatland conservation, landscape integrity, and community wellbeing, it lacks a solid evidential foundation.

There are significant gaps in the baseline data presented, an undefined design envelope, unverified mitigation measures, and missing assessments of key impact areas such as nocturnal wildlife, onshore infrastructure, and tourism effects. The Environmental Impact Assessment is thus incomplete, failing to provide a thorough understanding of the likely significant effects or any residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to submit a complete Social Impact Assessment is a serious omission. These shortcomings inhibit the competent authority from evaluating the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal contradicts the National Planning Framework 4 by failing to protect biodiversity, natural places, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net

economic benefit due to the lack of tourism impact analysis. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are uncertain and could be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The evidential burden required to discount adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and inhibiting a lawful conclusion regarding the acceptability of impacts.

The proposal would lead to 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 impacts on tourism are all permanent effects that cannot be effectively mitigated.

In summary, the application is procedurally and substantively inadequate for determination. The extensive deficiencies in information, along with policy contradictions and unresolved environmental risks, preclude a lawful and evidence-based decision. It is essential for the competent authority to either reject the consent application on these grounds or to invoke the relevant regulatory provisions to require the submission of the necessary information.

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

Additional Comments

I wish to object to the proposed offshore wind farm development N4 called "Spiorad na Mara" by the developers - an entirely inappropriate use of the Gaelic language in my opinion and clearly cultural appropriation. Please do not use our language in this way - anyone can see this for what it is - a cynical attempt to soften what is proposed and make it more palatable to islanders.

I am horrified by what is proposed, by the sheer scale and size of the development, the siting of enormous turbines so close to shore, the minuscule amount offered to local communities as compensation, the detrimental effect to health, wellbeing and quality of life for those living on the island and the fact that "green" energy is used to justify exploiting the natural resources of this land and sea for vast profits that are being made by large companies. Vast profits to be made and exported, like the energy produced to places far away from Lewis - profits only possible because of government subsidies. There are big questions to be asked about how "green" this energy is - it is certainly not clean.

This development will harm vulnerable and protected marine life and seabirds and harm the health and wellbeing of people who live on the island.

The reasons people enjoy living and spending time in Lewis are because it is unique in

its way of life, sense of community, peace and quiet, being close to nature and wildlife - it is a special and beautiful place that is being threatened by the desire to make large sums of money from its natural resources.

The west side of the island attracts large numbers of tourists - tourism provides opportunities for employment - tourism relies on all the things mentioned earlier - wildlife, seabirds, peace and quiet, places of cultural and historical significance etc.

The very essence of life on the island will be changed forever by industrialisation - by the desire to extract natural resources for profit.

This development will ruin life on the west side of the island forever - the views of the sea and landscape will be ruined, livelihoods and health will be irretrievably harmed. The long term consequences in terms of people leaving the island or having their lives ruined in many ways, e.g, by the noise and light pollution emitted from turbines not to mention. road building and full scale industrialisation cannot be measured - the human cost of this is too great.

That is in addition to the damage to marine and bird life and biodiversity in one of the most unspoilt places in the UK.

It has taken a long time to ask for people's opinions on this development. It is not acceptable to situate a development of this size, with such huge turbines so close to shore in this landscape with the resulting damage to people's health, environmental damage, damage to the industries eg tourism that we already have and are flourishing. In short people's lives and livelihoods are being harmed in the pursuit of profit - profit only possible because of government subsidies. Decisions about where to site the turbines have all been made in the name of profit.. Smaller developments in Shetland have been a disaster for the people who live there.

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: D6E8FBDF

Member of the public 937

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

Dear Sir/Madam

This letter formally objects to the Spiorad na Mara Offshore Wind Farm application, which was submitted under marine licensing and Environmental Impact Assessment regulations. The objection is founded on a review of the Environmental Impact Assessment Report and its accompanying documents. It identifies significant planning, environmental, cultural, and procedural deficiencies within the proposal. This development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, nearly untouched environment, and strong cultural identity. Concerns arise regarding the scale, proximity, and design of the project, as these factors appear to conflict with statutory requirements, national policy, and sustainable development principles.

The application does not present an adequate evidential basis for lawful determination. There is missing critical environmental data, and the baseline information provided is both limited and inconsistent. Additionally, key aspects of the proposal remain unspecified. The flexible design framework used in the application obstructs a clear understanding of significant effects, and without defined mitigation measures, it is impossible to assess their effectiveness. Consequently, the submitted documentation fails to provide a complete or informed understanding of the environmental, cultural, or community impacts. Claims asserting negligible or non-significant effects lack robust supporting evidence.

There are substantial policy conflicts present. The proposal seems inconsistent with the National Marine Plan, Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly evident concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not prove that it can meet the national requirements for protecting biodiversity, climate interests, and environmental integrity. These discrepancies challenge the statutory tests necessary for obtaining consent and hinder the competent authority's ability to determine the proposal's acceptability according to policy.

The unprecedented scale of this proposal, which includes large turbines placed near the shoreline, raises significant concerns related to landscape capacity, visual dominance, and environmental impact. When considering the insufficient information provided, the reliance on undefined mitigation measures, evidential weaknesses, and clear policy violations, it is evident that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks essential information and does not adequately detail the potential environmental consequences of the proposal. The reliance on a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations of turbines, creates substantial uncertainty. This situation hinders the assessment's integrity and results in potential discrepancies between the reported impacts and the actual development, leaving both the public and the competent authority without a clear understanding of the true environmental effects.

Moreover, the application is overly dependent on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that environmental damage will be managed later prevents a thorough evaluation of the effectiveness and residual impacts of these measures. This postponement of critical information until after consent is granted is procedurally improper and contradicts the objectives of the Environmental Impact Assessment process, which stipulates that significant effects and mitigation strategies must be clearly outlined before a decision is made.

There are also notable shortcomings in evidence, including insufficient baseline data, methodological limitations, and the use of assumptions rather than site-specific information. These issues lead to uncertainty about the scale and significance of the impacts, particularly where claims of negligible or non-significant effects are made without adequate supporting evidence. The lack of comprehensive information hampers the understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that does not align with statutory expectations.

As a result, the application does not meet the evidential criteria set by the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to show compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, 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, lack of specified mitigation measures, and deficiencies in baseline data renders the Environmental Impact Assessment Report incomplete and unreliable. These flaws impede a lawful and comprehensive evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate, failing to offer a complete understanding of the ecological receptors within the West Lewis coastal environment. This area is a highly sensitive marine system known for its biological activity, yet the baseline data is lacking, and the methodologies applied do not effectively capture species presence, behaviour, and habitat usage. Consequently, the

assessment does not provide a solid evidential basis for evaluating potential impacts.

A significant shortcoming is evident in the treatment of otters, a European Protected Species, where the application neglects to adequately acknowledge and assess their active use of coastal areas for foraging and movement. The assessment does not consider their core foraging range and behavioural patterns, leading to an inadequate evaluation of the potential impacts from construction disturbances, noise, and increased activity. This deficiency undermines any conclusions made regarding the absence of significant effects on otters.

Further issues arise with the assessment of basking sharks, which relies on aerial surveys that introduce notable detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate their presence when compared to established land-based observations that demonstrate frequent usage of these waters. The failure to integrate or properly consider such data further contributes to an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological shortcomings mean that any conclusions drawn about negligible or non-significant effects are grounded in assumptions rather than robust evidence. The absence of adequate baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the actual scale 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 protected species have not been appropriately identified or assessed. The level of uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application under consideration presents a fundamentally flawed ornithological assessment, characterised by significant gaps in evidence and internal inconsistencies that severely undermine its conclusions. The proposed 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 facing decline. However, the application fails to satisfy the required evidential standard to demonstrate that these species will not be adversely affected.

A critical contradiction lies 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 necessary when significant harm is anticipated. This incongruity raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the underlying evidence. Furthermore, the assessment does not adequately establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It neglects to fully account for the importance of these feeding grounds, and the reliance on modelling approaches introduces a degree of uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. The methodologies utilised are likely to underestimate mortality rates, especially in light of incomplete baseline data and insufficient understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor adds another layer of significant risk, effectively creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to thoroughly assess the long-term consequences of sustained mortality within this corridor or the potential effects on species with relatively small global populations.

Regulatory compliance is also called into question, as 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, means that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle, obstructing a lawful conclusion in favour of consent. Additionally, the deficiencies identified represent 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 places the proposal in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to internal inconsistency, methodological flaws, and insufficient evidence. These shortcomings obstruct a thorough evaluation of impacts and contribute to the overarching conclusion that the application fails to meet the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

A significant shortcoming is evident in the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites remain active places of burial and spiritual practice, yet they are mischaracterised as static features in the assessment. This failure to consider their continued use and the implications of

development on their setting leads to an incomplete evaluation of cultural effects and neglects their importance in community life.

Moreover, the assessment overlooks intangible cultural heritage, including the Gaelic language, traditions, and the longstanding connection between the community and the coastal environment. These elements are integral to the area's identity but are entirely absent from the evaluation, representing a considerable omission. Without acknowledging these factors, the cultural impact of the development cannot be fully grasped.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity that aligns with the characteristics of an Indigenous People. However, no process of Free, Prior and Informed Consent has been implemented. This lack of meaningful engagement diminishes the legitimacy of the assessment and fails to adhere to established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural failure lies in the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. This omission hinders the competent authority from meeting its legal obligations to evaluate the social, cultural, and economic impacts on the island community, preventing a lawful determination of the proposal.

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 neglect to consider both tangible and intangible heritage and the failure to recognise living cultural practices represent a clear departure from policy requirements.

Overall, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the development have not been adequately assessed, and the application does not offer a sufficient basis for evaluating the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

Residents are currently facing measurable stress, anxiety, and concern directly linked to the scale and proximity of the proposal, as indicated by available summaries. These impacts are based on actual engagement rather than speculation. However, the failure

to release the complete assessment hampers thorough examination of these findings and restricts the assessment of their significance in the decision-making process.

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

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

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

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

In summary, the non-disclosure of the full Social Impact Assessment, alongside the evidence of ongoing adverse impacts, renders the evaluation incomplete and unreliable. This situation precludes a lawful determination and underscores the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The 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 proposal involves extensive seabed preparation and installation works within a challenging Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. This shortfall is troubling, particularly as the application relies on unspecified mitigation and

contingency measures that are to be established only after consent is granted. Such an approach obstructs any meaningful assessment of these measures' adequacy and effectiveness.

The West Lewis coastline is home to clean coastal waters and vital habitats, which are at risk of disturbance and contamination from sediment. While the application acknowledges the potential risks of sediment mobilisation and the possibility of chemical or oil spills, it does not adequately detail the strategies for prevention, control, or monitoring of these risks. This inadequacy is concerning given the sensitivity of the receiving environment.

Moreover, there is ambiguity regarding the scale and behaviour of sediment plumes that may result from seabed disruption and cable installation. Without thorough modelling and clearly defined management strategies, the extent, duration, and ecological impacts of these disturbances remain indeterminate. This uncertainty also applies to potential effects on marine species and habitats that have been identified as sensitive within the broader assessment.

Additionally, the lack of detailed emergency response procedures exacerbates the situation. By postponing contingency planning to a stage after consent, the application hinders the assessment of whether adequate safeguards are available to address pollution incidents. This creates procedural risks and undermines the competent authority's ability to evaluate environmental protection measures at the time of determination.

From a regulatory viewpoint, the postponement of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. It is critical that likely significant effects and mitigation are assessed prior to consent, and the absence of such information renders a lawful determination impossible. The application further fails to show compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application presents serious shortcomings in its assessment of marine life and fisheries, which raises significant concerns regarding the ecological and socio-economic implications. It neglects to adequately address the diverse marine ecosystem found off the West Lewis coast, alongside the active fishing industry that relies on it. The proposal fails to prove that these vital habitats and activities can be maintained without considerable disruption.

A critical flaw lies in the assumption that fishing can simply be displaced without repercussions. The application does not provide evidence that alternative fishing grounds exist or can handle the added pressure. This is a crucial gap, as such displacement could lead to overfishing in other areas, which in turn may have adverse economic impacts on the local fishing fleet. Without a thorough, evidence-based evaluation, the potential repercussions for fisheries and livelihoods remain unclear.

The proposal also poses significant threats to marine species, particularly due to the underwater noise created during construction. The anticipated prolonged use of high-energy hammer piling is likely to disturb species across extensive distances, including dolphins. The projected disruption to a large portion of the local bottlenose dolphin population is alarming, yet the application minimises the importance of these effects and lacks adequate supporting evidence.

There exists a notable contradiction within the application, as it acknowledges the requirement for licences to permit harm to European Protected Species while simultaneously characterising the impacts as negligible. This inconsistency undermines the reliability of the assessment and raises concerns about compliance with the Habitats Regulations, particularly when it comes to anticipated harm requiring legal authorisation.

Moreover, the assessment does not adequately consider cumulative impacts that may arise from multiple pressures such as habitat disruption, noise, and fishing displacement. Without a thorough examination of these interconnected effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to National Planning Framework 4 or the National Marine Plan. It does not show that the development can coexist with current marine users or avoid unacceptable consequences for marine biodiversity, making it difficult to conclude that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is fundamentally lacking and does not consider the full range of impacts stemming from what constitutes a single integrated project. The offshore turbines and the associated onshore works are interconnected, yet they have been evaluated separately. This fragmented approach obscures the true extent of both environmental and socio-economic effects.

Among the onshore elements are cabling through protected moorland, the construction

of a substation near Stornoway, and the necessary access infrastructure that traverses sensitive landscapes. These activities entail excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The application fails to provide a thorough assessment of these impacts, thereby hindering a complete understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components are considered collectively; however, the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are inadequately understood.

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

Concerns also arise regarding carbon balance. The disturbance of peatland has the potential to release stored carbon, thereby creating a carbon debt that contradicts the objectives of renewable energy development. The application does not sufficiently address this matter or show that the overall carbon balance remains positive.

Furthermore, routing infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, which raises serious questions about the deliverability and lawful implementation of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The assessment fails to address the impacts of dark skies and nocturnal wildlife, marking a significant omission in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting, which would be visible over long distances, creates a continuous and

intrusive "wall of light" effect across the western horizon. This alteration fundamentally changes the night-time environment.

Additionally, the application does not evaluate how this lighting might affect visual amenity, landscape character, or the experiences of both residents and visitors. The importance of dark skies to the region's identity and the emerging astro-tourism sector heightens the significance of this oversight, leading to a clear gap in the overall landscape and environmental assessment.

More importantly, there is a lack of assessment concerning the effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and increase collision risks. The application fails to include any lighting impact assessment or a phototaxis study, leaving unexamined the potential effects of aviation lighting on these species and the associated risk of increased mortality.

This lack of evaluation is worsened by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activity or the risks that accompany it. Species such as Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this has not been assessed. Consequently, the absence of site-specific night-time data creates a crucial gap in understanding the ecological impacts.

Without a thorough assessment of nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites would 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 hindering a lawful determination.

From a policy standpoint, these omissions contravene National Planning Framework 4 concerning the protection of natural places and environmental quality. Furthermore, they undermine the overall evaluation of landscape and seascape impacts, as the character of night-time environments is integral to the overall ecology.

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

TOURISM

The application does not adequately assess the impacts of the proposed development on tourism, which is vital to the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application states that 86% of visitors are attracted by the scenery, it fails to provide any quantitative analysis of how large-scale offshore infrastructure might alter visitor numbers, behaviour, or overall economic contributions.

Tourism has significantly expanded, increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application does not explore how the industrialisation of the seascape and a decline in environmental quality could influence Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it remains unclear whether the development would provide a net economic benefit or harm an established and growing sector.

Moreover, the assessment overlooks the crucial role that environmental quality plays in supporting 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 further highlights this shortcoming and creates a substantial gap in understanding the impacts on a recognised and expanding part of the local economy.

For an island community with limited economic diversification, not evaluating tourism impacts carries broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been addressed as required by the Islands (Scotland) Act 2018.

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

Overall, the lack of a quantified assessment of tourism impacts, consideration of environmental factors affecting visitor behaviour, and acknowledgement of the island's economic dependency create a significant gap in the evidence base. This hinders a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

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

There are significant gaps in the baseline data, which are compounded by the use of an undefined design envelope and a reliance on unspecified mitigation measures. Key

impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, have been overlooked. Consequently, the Environmental Impact Assessment is incomplete and fails to provide a comprehensive understanding of potential significant effects or residual impacts.

Moreover, there are notable procedural shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to present a full Social Impact Assessment is a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings render the application unfit for determination.

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

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

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

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

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

Additional Comments

Having been brought up in Shawbost and living in different places during my adult life I appreciate the peacefulness and natural beauty of the island. There is nothing that can compare to sitting ,looking out to sea in all its different seasons. This is why tourists

come to the island. The peace., dark skies and solitude is hard to find elsewhere. This would be totally spoilt by these awful constructions at sea.

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: 64BC2C19

Member of the public 938

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough examination of the Environmental Impact Assessment Report and its accompanying documentation, which reveals numerous deficiencies in planning, environmental, cultural, and procedural aspects. This 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 identity. The design, scale, and proximity of the wind farm to the shoreline raise significant concerns regarding compliance with statutory requirements, national policy, and the principles underpinning sustainable development.

The application lacks a sufficient evidential basis necessary for a lawful determination. There are significant gaps in critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many key elements of the proposal remain undefined. The reliance on a flexible design framework obfuscates a clear understanding of the likely significant effects, while the unspecified mitigation measures prevent any assessment of their potential effectiveness. Consequently, the documentation fails to furnish a complete or informed understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsubstantiated by robust evidence.

Substantial conflicts with policy are evident. The proposal is not aligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts are critical as they directly impact the statutory tests necessary for consent, undermining the competent authority's capacity to ascertain that the development adheres to policy standards.

The unprecedented scale of this proposal, with large turbines positioned in close proximity to the shoreline, brings forth serious concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of adequate information, the dependence on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is 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 structured, evidence-based comparison of alternatives, which is essential under the Environmental Impact Assessment regime. Instead of a reasoned analysis of viable alternatives based on their environmental impacts, it provides a narrative that merely outlines the project's development. This raises serious concerns, as it does not convincingly show that less harmful options have been properly

identified, assessed, and chosen over more damaging ones.

There is a noticeable absence of transparent analysis regarding alternative offshore locations, development scales, and design configurations. Specifically, it fails to indicate whether the developer has genuinely considered positioning turbines further from the shore, where the potential for visual, ecological, and coastal impacts could be substantially lessened. Given the delicate nature of the West Lewis coastline and the critical role that proximity to shore plays in assessing impact, the lack of such evaluation precludes any assertion that the proposed siting is the least damaging option.

The inadequacies are also evident in the assessments related to cable routing and landfall, as there is insufficient evidence indicating that alternative routes have been thoroughly examined to avoid or lessen effects on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis suggest that mitigation by design has not been effectively implemented, relying instead on post-design mitigation measures.

Consequently, the application does not adequately 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, which prevents the competent authority from determining whether less harmful and more suitable alternatives are available. Without a comprehensive alternatives assessment, it cannot be concluded that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this shortcoming raises significant issues regarding compliance with National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission, which further supports the conclusion that the application has not undergone adequate evaluation and cannot be lawfully approved.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is inadequate, resulting in an unreliable understanding of the ecological receptors present. This coastal area is known for its sensitivity and biological activity; however, the baseline data provided is incomplete, and the methodologies employed do not sufficiently capture the presence, behaviour, or habitat use of various species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A significant oversight concerns otters, which are classified as a European Protected Species. The application does not appropriately recognise or assess their active use of coastal zones for foraging and movement. By failing to consider their core foraging

range and behavioural patterns, the assessment does not adequately evaluate the potential impacts of construction disturbances, noise, and increased activity, thereby undermining any conclusions about the absence of significant effects on this species.

Further shortcomings are evident in the assessment of basking sharks. The reliance on aerial surveys has introduced notable detection bias, particularly in challenging Atlantic conditions. This method is likely to result in an underestimation of their presence, especially when compared to established land-based observations that suggest frequent use of these waters. The omission of this relevant data leads to an incomplete baseline, further undermining the reliability of the conclusions drawn.

These methodological flaws result in conclusions of negligible or non-significant effects being based more on assumptions than on robust evidence. Additionally, the lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the true extent of risks posed to marine species and habitats.

From a regulatory standpoint, the application fails to comply with the requirements outlined in the Environmental Impact Assessment regime and the National Planning Framework 4. The assessment has not properly identified or evaluated protected species, leading to a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt. As such, the precautionary principle is engaged, making it unlawful to grant consent in these circumstances.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions leads to an unreliable assessment. These deficiencies inhibit a thorough evaluation of the 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 exhibits significant deficiencies, undermining its reliability and the conclusions drawn from it. A crucial aspect of the application is the presence of contradictory findings, particularly where the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case. This latter case is only warranted in situations where substantial harm is anticipated, which casts doubt on the reliability of the assessment and suggests a disconnect between the conclusions and the available evidence.

The assessment fails to adequately demonstrate that seabird populations associated with critical protected sites, such as the Lewis Peatlands and St Kilda, will not face adverse impacts. There is insufficient consideration given to the significance of key feeding grounds, and the reliance on modelling approaches introduces a level of uncertainty that is particularly concerning for species that are already in severe decline, such as Kittiwakes and Fulmars. The methodologies utilised may also lead to an

underestimation of mortality rates, especially given the gaps in baseline data and the incomplete understanding of species' behavioural responses.

Furthermore, the placement of turbines within a recognised migratory corridor adds another layer of risk, as it effectively acts as a barrier in a primary flight path used by birds migrating between the United Kingdom and Iceland. The assessment does not sufficiently consider the long-term consequences of sustained mortality in this corridor, nor does it adequately address the potential effects on species that have relatively small global populations.

From a regulatory standpoint, the application falls short of meeting the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The combination of contradictory findings, data gaps, and limitations in modelling means that the standard of proving beyond reasonable scientific doubt has not been fulfilled. This situation engages the precautionary principle, which precludes a lawful conclusion in favour of consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development has not adequately assessed the cultural heritage and community identity associated with the West Lewis coastline. This area is a living cultural landscape, where environment, language, tradition, and community are interconnected. The application employs a reductive perspective, treating heritage as isolated, static assets, neglecting their ongoing social, cultural, and spiritual relevance within the community.

A significant flaw in the assessment concerns culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice. However, the assessment erroneously categorises them as static features, overlooking their continued use and the implications of development on their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural effects and fails to acknowledge their importance within community life.

Additionally, the application neglects to evaluate intangible cultural heritage, which includes the Gaelic language, traditions, and the enduring relationship between the

community and the coastal environment. These aspects are vital to the area's identity, yet they are entirely omitted from the assessment, representing a significant oversight. Without addressing these elements, a thorough understanding of the cultural impact of the development is unachievable.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity that aligns with recognised characteristics of an Indigenous People. Nevertheless, the process of Free, Prior and Informed Consent has not been conducted. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to adhere to established principles of participation in decisions affecting cultural and environmental interests.

Moreover, a critical procedural error is the absence of a compliant Island Communities Impact Assessment, a statutory requirement established by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfill its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone hinders a lawful determination.

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

In summary, the lack of assessment regarding living heritage, intangible cultural value, community rights, and adherence to statutory obligations results in a significant evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application does not provide a sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development is fundamentally flawed due to the lack of a complete and transparent assessment of social impacts, health, and wellbeing. The developer has commissioned a Social Impact Assessment that included engagement with local residents through focus groups; however, the full report has yet to be published. This significant evidential gap obstructs both public understanding and the competent authority’s ability to evaluate the social risks that the developer's own research has identified.

Available summaries reveal that local residents are experiencing considerable levels of stress, anxiety, and concern stemming from the scale and proximity of the proposal. These findings are based on direct community engagement and should not be regarded as speculative. Nevertheless, the failure to disclose the complete assessment hampers thorough scrutiny of the results and hinders the capacity to appraise their significance in the decision-making framework.

Additionally, evidence points to the notion that the proposal threatens community identity and cohesion, with a recognition of “cultural loss” within the developer’s findings. Despite this acknowledgment, these social impacts have not been duly incorporated into the main application nor given the necessary consideration. The withholding of the entire Social Impact Assessment obscures the true human and social cost associated with the proposed development.

This lack of transparency severely undermines the Environmental Impact Assessment process, as a comprehensive understanding of the social, economic, and health ramifications is crucial for developments of this magnitude, particularly when community character and functioning may be jeopardised. The omission of the full dataset leads to an inadequate evidential basis for weighing benefits against potential harms.

From a policy standpoint, the application does not comply with National Planning Framework 4 concerning health and wellbeing. Development initiatives are mandated to promote positive health outcomes and avert detrimental impacts; however, the evidence currently available illustrates existing adverse effects that remain undisclosed. Without the full assessment, the ability to demonstrate compliance with this policy is compromised.

The procedural implications of this situation are significant. The competent authority is unable to conduct a thorough socio-economic and health assessment without access to the full Social Impact Assessment. This represents a material omission in the application and signifies a failure to satisfy the evidential requirements under the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the complete Social Impact Assessment, along with documented evidence of current adverse impacts, renders the assessment incomplete and unreliable. This situation precludes a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual, seascape, and landscape impacts is alarmingly inadequate and does not truly capture the extent of change or the sensitivity of the environment that would be affected. The West Lewis coastline is characterised by its expansive Atlantic horizon, its unspoilt nature, and its profound sense of remoteness. The proposed installation of large-scale turbines near the shoreline would impose a continuous industrial presence, fundamentally altering this character and leading to a permanent and irreversible change to the landscape.

Moreover, the application fails to portray the scale of this visual disruption accurately. The turbines would dominate views from residential areas, historic sites, and popular coastal spots, directly impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment neglects to adequately express the significance of this impact within such a vulnerable landscape.

Concerns also arise regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not capture the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This oversight risks understating the visual impact's magnitude and calls into question the reliability of the assessment.

Another serious shortcoming is the failure to consider the interconnected nature of the landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape linked by visual and spatial relationships to the Atlantic horizon. The assessment erroneously treats these as separate assets rather than acknowledging their interdependence, resulting in an incomplete understanding of the impacts on their setting and cultural relevance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and breaking their connection to the natural horizon. This impact transcends mere visual disruption, representing a significant cultural and spatial harm that the application does not adequately address.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, which relates to the protection of natural environments and historic sites. The scale of proposed change is fundamentally at odds with the necessity to preserve landscape character, visual amenity, and the contexts of culturally important locations. Furthermore, the absence of a thorough worst-case assessment raises serious doubts about compliance with policy requirements.

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

In summary, the assessment fails to represent the impact's scale, the environment's sensitivity, and the interconnectedness of landscape and heritage. These significant deficiencies preclude a reliable evaluation and reinforce the assertion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks sufficient detail regarding construction and pollution risks, leaving the assessment incomplete and unable to adequately evaluate the likely environmental effects. It involves significant seabed preparation and installation works in a high-energy Atlantic environment, yet it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be formulated after consent has been granted, which hampers any meaningful assessment of their

effectiveness or adequacy.

This dependence on unspecified future measures raises serious concerns, particularly in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential accidental chemical or oil spills, it falls short of providing enough detail on how these incidents will be prevented, controlled, or monitored.

Uncertainty also surrounds 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 extends to potential effects on marine species and habitats that have already been recognised as sensitive within the wider assessment.

Moreover, the absence of comprehensive emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application restricts the ability to evaluate whether sufficient safeguards are in place to address pollution incidents. This introduces procedural risks and undermines the capacity 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 of the Environmental Impact Assessment regime. Significant effects and necessary mitigations must be evaluated prior to consent, and the lack of such information renders a lawful determination impossible. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the failure to provide defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts collectively render the assessment deficient. These shortcomings obstruct a thorough evaluation of construction and pollution risks and further reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of the proposed development is fraught with significant inadequacies, particularly regarding its evaluation of fisheries and marine life. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. However, the application does not adequately demonstrate how these vital uses and habitats will be protected or sustained without substantial disruption.

A critical concern is the presumption that fishing activities can be displaced without adverse effects. The application lacks any evidence to support the availability, accessibility, or capacity of alternative fishing grounds to handle the additional

pressures that would result from displacement. This oversight is crucial, as the risk of overfishing in alternative locations could impose wider economic ramifications for the local fishing fleet. A clear, evidence-based assessment is necessary to understand the implications for fisheries and the livelihoods dependent on them.

Moreover, the proposal poses considerable risks to marine species, notably through the underwater noise generated during construction activities. The use of high-energy hammer piling over an extended duration is likely to disrupt marine life over vast distances, particularly affecting populations such as dolphins. The anticipated disturbances to a significant portion of the local bottlenose dolphin population raise serious concerns, yet the application seems to minimise these impacts without adequate supporting evidence.

There exists a troubling inconsistency within the application: it acknowledges the necessity for licences to authorise harm to European Protected Species, yet simultaneously characterises the impacts as negligible. This contradiction undermines the assessment's credibility and raises serious questions about its compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

The assessment further neglects to address cumulative impacts resulting from multiple stressors, such as habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these interconnected effects, the overall impact on marine ecosystems and socio-economic conditions remains indeterminate.

From a policy standpoint, the application falls short of demonstrating compliance with the National Planning Framework 4 or the National Marine Plan. It does not adequately establish that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thus precluding any conclusion that the proposal aligns with sustainable development principles.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

Among the onshore elements are cabling that crosses protected moorland, the construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. This construction involves excavation in areas of deep peat,

particularly within Barvas Moor, which serves as a crucial carbon store and ecologically sensitive habitat. The application does not provide a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposed development introduces permanent red aviation lighting that would be visible over considerable distances, creating an intrusive “wall of light” effect across the western horizon. This alteration to the night-time environment is significant, particularly as the application fails to assess the impact of this lighting on visual amenity, landscape

character, or the experiences of both residents and visitors. The importance of preserving dark skies is underscored by the area's identity and the growth of tourism sectors such as astro-tourism.

Moreover, the Environmental Impact Assessment does not address the effects on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The absence of a lighting impact assessment or a phototaxis study means that the application overlooks the potential adverse effects of aviation lighting on these species, increasing their mortality risk.

The issue is further compounded by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and associated hazards. Kittiwakes, for instance, may forage or migrate at night and are also susceptible to disorientation from artificial lighting. This lack of site-specific night-time data highlights a critical gap in understanding the ecological impacts involved.

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

From a policy standpoint, these omissions contravene National Planning Framework 4 regarding the protection of natural spaces and environmental integrity. They also undermine the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is integral to the overall ecosystem.

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

TOURISM

The application presents a concerning deficiency in assessing tourism impacts, crucial for the economy of the Isle of Lewis. With tourism significantly reliant on the region's wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness, the application acknowledges that 86% of visitors are attracted by the scenery. However, it fails to provide any quantified assessment of how large-scale offshore infrastructure could alter visitor numbers, behaviours, or the economic contributions made by this sector.

Tourism has seen substantial growth, with revenue rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Despite this, there is no modelling to examine how the potential industrialisation of the seascape and subsequent loss of environmental quality might

affect Tourism Gross Value Added or the overall economic resilience of the area. This lack of analysis renders it impossible to ascertain if the proposed development would result in a net economic benefit or detriment to a crucial and expanding sector.

Furthermore, the assessment neglects to address the critical role that environmental quality plays in tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience, alongside emerging markets such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this issue, creating a considerable gap in understanding the effects on a recognised and burgeoning segment of the local economy.

Given the limited economic diversification within the island community, the neglect to assess tourism impacts carries broader ramifications for employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been adequately evaluated as stipulated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4, particularly concerning economic 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 evaluate the economic consequences of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, the failure to analyse environmental factors influencing visitor behaviour, and the disregard for the island's economic dependencies culminate in a significant evidential gap. This inhibits a thorough evaluation of economic effects and supports the conclusion that the application is fundamentally incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a critical failure to meet the standards of sustainable development when evaluated against statutory requirements, national policy, and necessary evidence. This application mirrors the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Now, it is being presented under a policy framework that places increased emphasis on biodiversity, peatland preservation, landscape integrity, and the wellbeing of the community.

There is a lack of a complete and reliable evidential foundation for making a determination on this application. Significant gaps in baseline data persist, accompanied by the use of an undefined design envelope. The reliance on unspecified mitigation measures and the failure to include crucial impact pathways—such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—are apparent. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a thorough understanding of the significant effects or residual impacts that

may arise.

Furthermore, procedural shortcomings are evident. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as outlined in the Islands (Scotland) Act 2018, while the failure to present a complete Social Impact Assessment signifies a material omission. Such inadequacies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal also stands in opposition to National Planning Framework 4, lacking demonstration of biodiversity protection, safeguarding of natural areas, and preservation of cultural heritage. It fails to show that the health and wellbeing impacts are acceptable and cannot prove a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been thoroughly evaluated, obscuring consequences for peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent with one another. The evidential threshold necessary to discount adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively unsuitable for determination. The significant information deficiencies, along with conflicts with policy and unresolved environmental risks, preclude a lawful and evidence-based decision. The competent authority must reject this application or invoke the appropriate regulatory measures to compel the submission of the necessary information.

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

Additional Comments

I am a writer, photographer and a lover of nature, my house looks out at the Atlantic, and the view is beautiful, to be changed forever if sixty 338m wind turbines are stuck on the seascape. The long dark winter days and nights are also special for me - they too will be gone with 60 turbines polluting the night with flashing aviation warning lights!

As a photographer my work is all Island related - seabirds, sea-life, sea views, coastlines; I hate the thought of having to photo-shop a huge wind farm out of my

photos. I have read up on the likely effect on marine and wildlife, especially some seabirds.

The thought of the impact of this massive blot on our landscape is already depressing, and I am already seriously contemplating moving if this project goes ahead. The people of this Island should have been consulted before any plans were started!

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: 348AA5AB

Member of the public 939

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is based on a comprehensive review of the Environmental Impact Assessment Report and associated documentation, revealing significant planning, environmental, cultural, and procedural deficiencies. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns arise regarding the proposal's scale, proximity, and design, as these factors fundamentally challenge its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential foundation for a lawful determination. There is a notable absence of critical environmental data, while baseline information is found to be limited and inconsistent. Key components of the proposal remain undefined, and the use of a flexible design framework complicates the assessment of likely significant effects. Furthermore, the reliance on unspecified mitigation measures hinders the evaluation of their potential 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 lack robust evidential support.

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

The unprecedented scale of the proposal, featuring large turbines positioned near the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, dependence on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance underscores the application’s incompleteness and its incapacity 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 lacks the necessary comprehensiveness and transparency to properly evaluate the likely environmental effects of the proposal. The flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for the turbines, creates considerable uncertainty. This ambiguity hampers the ability to apply a worst-case scenario consistently, undermining the reliability of the assessment and failing to convey the true scale of potential environmental impacts to both the public and the relevant authorities.

Furthermore, the application places heavy reliance on mitigation measures, monitoring strategies, and management plans that are not yet defined. This approach seeks consent on the premise that any environmental harm will be managed at a later date, thus inhibiting meaningful evaluation of their effectiveness and the assessment of residual impacts. Such deferral of vital information to post-consent phases is procedurally unacceptable and contradicts the core aim of the Environmental Impact Assessment regime, which stipulates that significant effects and mitigation measures must be clearly defined before any determination.

The report also exhibits significant evidential deficiencies, marked by gaps in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. This lack of sufficient information leads to uncertainty about the scale and significance of impacts, especially when negligible or non-significant effects are asserted without adequate supporting data. The shortcomings in information hinder an understanding of cumulative and worst-case impacts and introduce scientific uncertainty that conflicts with statutory requirements.

Consequently, the application does not satisfy the evidential standards necessary under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal fails to demonstrate compliance with National Planning Framework 4, which includes requirements for biodiversity protection and environmental integrity. It cannot be established that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application presents significant inadequacies in its assessment of alternatives, failing to satisfy the statutory requirements set forth by the Environmental Impact Assessment regime. Rather than offering a well-structured and reasoned comparison of viable alternatives based on their environmental impacts, the application provides a narrative that recounts the evolution of the project. This method does not sufficiently

demonstrate that less harmful options have been appropriately identified, assessed, and preferred over more damaging solutions.

There is a lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. Notably, the application does not indicate that the developer has genuinely considered the possibility of placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. Considering the sensitivity of the West Lewis coastline and the critical role that proximity to the shore plays in determining impact, the failure to conduct such analysis inhibits any conclusion that the proposed siting is the least damaging option available.

These inadequacies also affect the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been thoroughly explored to avoid or mitigate impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear avoidance strategy, combined with a lack of comparative analysis, suggests that there has been no application of mitigation by design, with an overreliance instead on post-design mitigation measures.

Consequently, the application does not convincingly demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This constitutes a failure to adhere to the established mitigation hierarchy, preventing the competent authority from ascertaining whether less harmful and more suitable alternatives exist. In the absence of a robust alternatives assessment, it is impossible to conclude that the proposal constitutes a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment presented regarding marine ecology and protected species is inadequate, failing to provide a comprehensive understanding of the ecological receptors in the West Lewis coastal area. This marine environment is both sensitive and biologically active, yet the baseline data remains incomplete. The methodologies used do not effectively capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

There is a significant oversight concerning otters, which are a European Protected Species. The application does not appropriately recognise or evaluate their active use

of coastal areas for foraging and movement. This neglect of their core foraging range and behavioural patterns means the assessment does not adequately consider the potential effects of construction activities, noise, and increased human presence. As a result, the conclusions regarding the absence of significant impacts on this species are undermined.

Moreover, there are notable deficiencies in the assessment of basking sharks. The reliance on aerial surveys creates a substantial detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate their presence, especially when compared to established land-based observations that indicate regular use of these waters. The failure to include or adequately consider such data leads to an incomplete baseline, compromising the reliability of the conclusions drawn.

These methodological shortcomings result in claims of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of sufficient baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This situation introduces uncertainty regarding the actual risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the requirements outlined in the Environmental Impact Assessment regime and National Planning Framework 4, as there has been inadequate identification and assessment of protected species. The uncertainty created prevents any conclusion about adverse effects from being excluded beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Under these conditions, granting consent is not legally permissible.

In summary, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions renders the assessment unreliable. These issues impede a thorough evaluation of impacts on marine ecology and protected species, leading to the overarching conclusion that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment conducted is deeply flawed and presents critical gaps in evidence that raise serious concerns about its validity. Located in key foraging areas and migratory pathways, the site of the proposed development has significant implications for internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already experiencing declines. Alarmingly, the application fails to provide the necessary evidence that these vulnerable species will not be adversely affected.

A troubling contradiction arises within the application itself, wherein the developer asserts that there will be no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case. Such a case is typically only put forward when significant harm is anticipated, which casts doubt on the overall reliability of the

assessment and suggests that its conclusions are not adequately supported by the evidence provided. Furthermore, the assessment inadequately addresses the potential impacts on seabirds associated with protected areas, including the Lewis Peatlands and St Kilda. The critical nature of these feeding grounds has not been sufficiently recognised, and the reliance on modelling techniques introduces considerable uncertainty, particularly for species such as Kittiwakes and Fulmars that are in steep decline.

The siting of turbines within an established migratory corridor presents additional risks, effectively serving as a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. There is a notable lack of thorough evaluation regarding the long-term effects of sustained mortality in this corridor, particularly concerning species with smaller global populations.

From a regulatory standpoint, the application does not meet the evidential threshold required to affirm that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations of the modelling, indicates that the assessment has not reached the standard of beyond reasonable scientific doubt. This situation activates the precautionary principle and hinders a lawful conclusion that could support consent.

Additionally, the identified deficiencies illustrate a failure to comply with National Planning Framework 4, particularly regarding biodiversity protection and the conservation of natural assets. The inability to adequately demonstrate that internationally important seabird populations will remain unaffected puts the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage along the West Lewis coastline is fundamentally flawed, failing to recognise it as a living cultural landscape where the environment, language, tradition, and community are interwoven. The application adopts a narrow perspective that reduces heritage to isolated and static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment categorises them merely as static features. This oversight disregards their continued use, meaning, and the impact that development could have on their setting. As a result, the evaluation of cultural effects is incomplete and ignores their vital role in community life.

Moreover, the assessment neglects intangible cultural heritage, including the Gaelic language, traditions, and the deep-rooted relationship between the community and the coastal environment. These elements are crucial to the area's identity, yet they are entirely overlooked, resulting in a significant gap in understanding the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, possessing a distinct cultural identity akin to that of an Indigenous People, has not been engaged through a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to adhere to established principles of participation in decisions that impact cultural and environmental interests.

Another critical failure is the omission of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

These deficiencies place the proposal in direct conflict with the National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to address both tangible and intangible heritage, alongside the disregard for living cultural practices, marks a clear deviation from policy requirements.

Overall, the lack of assessment regarding living heritage, intangible cultural values, community rights, and adherence to statutory obligations creates a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application insufficient to assess the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal has been met with significant concern due to the evident deficiencies in the assessment of social impacts, health, and wellbeing. While the developer did commission a Social Impact Assessment that involved focus groups with local residents, the absence of the full report raises substantial issues. This lack of transparency creates a notable evidential gap, hindering both the public and the competent authority from fully grasping the extent of social risks identified in the developer's own research.

Summaries provided reveal that residents are currently facing measurable stress, anxiety, and concern linked to the scale and proximity of the proposed development. These findings stem from direct engagement, indicating that the impacts are concrete rather than speculative. However, without access to the complete assessment, it is impossible to scrutinise these findings properly or evaluate their significance in the decision-making process.

Furthermore, there is a clear perception that the proposal threatens community identity and cohesion, with "cultural loss" cited in the developer's findings. Regrettably, these serious impacts have not been adequately considered in the main application, nor have they been assigned the appropriate weight. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

The implications of this lack of transparency extend to the Environmental Impact Assessment process itself. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. By failing to provide the complete dataset, the application does not present a sound evidential basis necessary to weigh benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and avoid causing harm; however, the evidence available suggests that existing adverse effects have not been fully disclosed. Without the full assessment, it cannot be shown that the proposal complies with this policy.

The procedural ramifications are considerable. The competent authority is unable to perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission signifies a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment conducted on seascape, landscape, and visual impacts lacks sufficient detail and does not accurately reflect the scale of change or the sensitivity of the surrounding environment. The character of the West Lewis coastline is marked by an open Atlantic horizon, an undeveloped landscape, and a strong sense of remoteness. Introducing large-scale turbines near the shoreline would create an industrial presence that is both continuous and dominant, fundamentally changing this character and leading to a permanent and irreversible transformation of the landscape.

Furthermore, the application fails to adequately depict the extent of visual change. Given their scale and proximity, the turbines 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 effectively convey the significance of this impact within such a sensitive landscape context.

Methodological issues also arise concerning how visual viewpoints were chosen and presented. Evidence suggests that some viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, especially regarding critical cultural heritage sites and valued landscapes. This raises concerns that the visual impact's magnitude may have been understated, which in turn compromises the reliability of the assessment.

Another notable deficiency is the lack of consideration for the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are not isolated; they are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment fails to acknowledge this interdependence, leading to an incomplete understanding of the impacts on both their setting and cultural significance.

Industrialising the seascape would disrupt these connections, changing how heritage assets are perceived and severing their ties to the natural horizon. This presents not just a visual issue, but also cultural and spatial harm that has not been sufficiently examined in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, particularly concerning the safeguarding of natural places and historic assets. The extent 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 robust worst-case assessment further undermines any assertion of compliance with policy.

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of the construction and pollution risks associated with the proposal is notably deficient, lacking the essential detail needed to evaluate the potential environmental impacts effectively. This project includes substantial seabed preparation and installation within a high-energy Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans in place. Instead, the application relies on vague mitigation and contingency measures that are intended to be developed after consent has been granted, which hampers any meaningful assessment of their adequacy or

effectiveness.

The reliance on unspecified future measures raises significant concerns, particularly in light of the sensitivity of the local environment. The West Lewis coastline is characterised by clean coastal waters and important habitats that are at risk from sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

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

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application obstructs the evaluation of whether appropriate safeguards are established to address pollution events. This introduces procedural risks and undermines the ability of the competent authority to assess the necessary environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of vital environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and required mitigation measures must be evaluated prior to granting consent; without this information, a lawful determination cannot be reached. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In conclusion, the absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts collectively indicate that the assessment is materially deficient. These shortcomings inhibit a thorough evaluation of construction and pollution risks, reinforcing 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, yet the application under review presents an inadequate assessment of fisheries and marine life. It does not deliver a robust evaluation of either ecological or socio-economic impacts. A significant concern is the assumption that fishing activity can be displaced without consequences. The application lacks evidence supporting the availability, accessibility, or capability of alternative fishing grounds to handle additional pressure. This oversight is critical as it poses risks of overfishing in other areas and may lead to wider economic repercussions for the local fishing fleet.

Without a thorough, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Furthermore, the proposal raises considerable risks for marine species due to underwater noise generated during construction activities. The high-energy hammer piling anticipated over an extended duration is likely to cause disturbances across large distances, significantly affecting species such as dolphins. The application suggests a likely disturbance to a considerable portion of the local bottlenose dolphin population, yet this is downplayed without adequate supporting evidence, which raises serious concerns.

There exists a notable inconsistency within the application, where the necessity for licences to permit harm to European Protected Species is recognised, while impacts are concurrently described as negligible. This contradiction undermines the credibility of the assessment and calls into question compliance with the Habitats Regulations, especially where harm is anticipated to a level necessitating legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

Onshore elements encompass cabling that traverses protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure that runs through sensitive landscapes. This construction involves excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and an ecologically delicate habitat. The application lacks a thorough assessment of these impacts, which obstructs a comprehensive understanding of the

project's total environmental footprint.

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism value. However, the Environmental Impact Assessment omits any assessment of dark skies and nocturnal wildlife, representing a significant gap in the analysis. The proposed introduction of permanent red aviation lighting would create a continuous "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. Given the significance of dark skies to the area's identity and to emerging tourism sectors such as astro-tourism, this omission is crucial. The absence of consideration for these impacts leads to a clear deficiency in the overall landscape and environmental assessment.

Moreover, there is no evaluation 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 result in disorientation and an increased risk of collision. The lack of a lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species and the risk of increased mortality have not been evaluated.

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

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

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

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

TOURISM

The evaluation of tourism impacts in the application is fundamentally flawed and does not address the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's stunning coastline, largely untouched landscape, dark skies, and overall sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide any quantifiable assessment of how the proposed large-scale offshore infrastructure would influence visitor numbers, behaviour, or their economic contributions.

Tourism has seen substantial growth, rising from £65 million in 2017 to more than £81.5 million, supporting over 1,000 jobs and representing up to 16% of the island's economy.

However, the application neglects to model the potential impacts of the industrialisation of the seascape and the consequent degradation of environmental quality on Tourism Gross Value Added and broader economic resilience. Without this essential analysis, it is impossible to ascertain whether the development would provide a net economic benefit or adversely affect an established and thriving sector.

Furthermore, the assessment overlooks the significance of environmental quality in sustaining tourism, especially the value of pristine landscapes and dark skies to the visitor experience, as well as to burgeoning markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a substantial gap in understanding the implications for this recognised and expanding segment of the local economy.

In a context where the island community suffers from limited economic diversification, the failure to evaluate tourism impacts carries broader consequences for employment, local businesses, and community sustainability. The absence of a proper Island Communities Impact Assessment indicates that these economic vulnerabilities have not been analysed as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly concerning economic impacts and the necessity to show net benefits. It also contradicts strategic objectives that designate tourism as a priority growth sector, failing to furnish adequate evidence for the competent authority to evaluate the economic implications of the proposal.

Collectively, the deficiencies in quantifying tourism impacts, assessing environmental drivers of visitor behaviour, and acknowledging the island's economic dependence culminate in a significant evidential gap. This undermines a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the requirements of sustainable development when evaluated against statutory duties and national policy. This application echoes the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Despite being presented under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it remains inadequate.

There is a notable lack of a complete and reliable evidential basis for determination. Critical gaps in baseline data persist, and the application relies on an undefined design envelope and unspecified mitigation measures. Key impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, preventing a full understanding of likely significant effects or residual impacts.

Procedural failures are also evident. The absence of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, and the failure to disclose the complete Social Impact Assessment is a material omission. Such deficiencies hinder the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

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

Environmental risks remain uncertain and potentially significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and obstructing any lawful conclusion about the acceptability of impacts.

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

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

A formal request is therefore made for the refusal of the application for the Spiorad na Mara Offshore Wind Farm in its entirety.

Additional Comments

I am utterly horrified by our last remaining wild spaces being sold for money to big energy companied. The destruction snd debestation it cause to our sea birds and marine animals is now well known researched and measured. It is devestating and ecoside is bring committed. Please please dig into your Scottish heritage. Your deep connection to our beautiful unique lands and dont destroy them anymore. Please protect our heritage lands bird and sealife for your and all our children and generations to come

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: 6923B072

Member of the public 940

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

Dear Sir/Madam

This letter represents a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A review of the Environmental Impact Assessment Report and the supporting documentation has identified significant deficiencies in terms of material planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, in an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The design, scale, and proximity of the project raise serious questions about its alignment 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 noticeable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many key aspects of the proposal remain undefined. The employment of a flexible design framework hinders a clear understanding of the likely significant effects, and the reliance on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation does not afford a comprehensive understanding of the potential environmental, cultural, or community impacts, and the claims made regarding negligible or non-significant effects are not substantiated by robust evidence.

The proposal also presents clear and substantive conflicts with existing policy frameworks. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. There is insufficient demonstration that national requirements aimed at protecting biodiversity, climate interests, and environmental integrity are being met. These policy conflicts are directly relevant to the statutory tests required for consent and significantly undermine the ability of the competent authority to determine that the development is policy-compliant.

The scale of the proposed wind farm is unprecedented for this location, with large turbines proposed to be installed in close proximity to the shoreline, raising substantial concerns about landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, the reliance on undefined mitigation measures, evidential weaknesses, and evident non-compliance with policy indicate that the application is incomplete and fails to support a lawful determination. Given these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that compromise its reliability and transparency regarding the potential environmental impacts of the proposal. Central to this issue is the use of a flexible Project Design Envelope, which lacks commitment to specific dimensions, layouts, or configurations for the turbines. This introduces a level of uncertainty that hinders the consistent application of a worst-case scenario, ultimately undermining the assessment's integrity. As a result, the documented impacts may not accurately represent what will be constructed, thereby preventing both the public and the competent authority from grasping the true extent of the environmental effects.

Moreover, the application leans heavily on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under such conditions implies that environmental harm will be addressed later, which obstructs any meaningful evaluation of effectiveness and assessment of residual impacts. This approach to deferring key information until post-consent stages is not only procedurally unacceptable but also contradicts the fundamental purpose of the Environmental Impact Assessment regime. This regime necessitates the clear establishment of likely significant effects and mitigation prior to determination.

There are also notable gaps in evidence, including missing baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. This leads to uncertainties about the scale and significance of impacts, particularly when negligible or non-significant effects are asserted without adequate supporting data. The lack of comprehensive information further obscures the understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not meet the evidential threshold required by the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This raises the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to the National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot be proven that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specific mitigation, and the gaps in baseline data collectively render the Environmental Impact Assessment Report incomplete and unreliable. These shortcomings hinder a lawful and thorough assessment of environmental effects and leave the competent authority unable to make a determination based on the information that has been provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species associated with the application is significantly flawed, lacking a comprehensive and reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is known for its high sensitivity and biological activity, yet the baseline data is insufficient,

and the applied methodologies do not adequately capture key factors such as species presence, behaviour, and habitat use. Consequently, the assessment falls short of providing a solid evidential foundation necessary for impact evaluation.

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development presents significant deficiencies, rendering it unreliable. It fails to demonstrate adequately, to the necessary evidential standard, that internationally important seabird populations on the west coast of the Isle of Lewis will not be adversely affected. Many of these species are already in decline, and the development is situated within crucial foraging areas and migratory pathways. The implications of displacement, collision risk, and habitat loss are not

rigorously evaluated, which undermines the overall conclusions of the assessment.

A key inconsistency within the application arises from the developer's conclusion of no significant adverse effects, which contradicts the advancement of a Habitats Regulations derogation case, typically necessitated only in instances where significant harm is anticipated. This contradiction raises serious concerns about the reliability of the assessment, suggesting that the conclusions drawn lack adequate supporting evidence. The assessment does not convincingly demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds has not been fully considered, and reliance on modelling approaches introduces uncertainty, particularly for species experiencing severe declines, including Kittiwakes and Fulmars. Methodologies employed are likely to underestimate mortality rates due to incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines within an established migratory corridor poses an additional, significant risk, as it creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not sufficiently evaluate the long-term effects of sustained mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application fails to meet the evidential threshold required to ascertain no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, in conjunction with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, which impedes a lawful conclusion in favour of consent. Furthermore, the identified deficiencies illustrate non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to substantiate that internationally significant seabird populations will remain unaffected directly conflicts with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the proposed development fundamentally lacks adequacy in terms of cultural heritage and community identity. The West Lewis coastline should be regarded as a living cultural landscape where the interconnection of environment, language, tradition, and community is vital. However, the application adopts a simplistic viewpoint that reduces heritage to mere static assets, ignoring their dynamic social, cultural, and spiritual roles within the community.

A significant shortcoming lies in the handling of culturally important sites such as the

cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment treats them as static features. This narrow perspective fails to acknowledge their ongoing significance and the effects of development on their settings. Such mischaracterisation leads to an incomplete assessment of cultural impacts and neglects their integral role in community life.

The assessment is also deficient in its consideration of intangible cultural heritage. Essential elements such as the Gaelic language, local traditions, and the community's deep-rooted relationship with the coastal environment are absent from the evaluation. These elements are crucial to the identity of the area and their omission represents a glaring oversight. Without incorporating these factors, the cultural implications of the proposed development remain inadequately understood.

Moreover, there are serious concerns regarding community rights and engagement. The Gaelic-speaking population represents a distinct cultural identity akin to that of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement calls into question the validity of the assessment and fails to align with established principles of participation in matters that affect cultural and environmental interests.

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

From a policy standpoint, these deficiencies create a direct conflict with National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The failure to account for both tangible and intangible heritage, and to recognise living cultural practices, signifies a clear deviation from policy requirements.

Collectively, the neglect of assessing living heritage, intangible cultural value, community rights, and statutory obligations results in a critical evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application does not establish a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal has been met with significant concern due to the evident deficiencies in the assessment of social impacts, health, and wellbeing. While the developer did commission a Social Impact Assessment that involved focus groups with local residents, the absence of the full report raises substantial issues. This lack of transparency creates a notable evidential gap, hindering both the public and the competent authority from fully grasping the extent of social risks identified in the developer's own research.

Summaries provided reveal that residents are currently facing measurable stress, anxiety, and concern linked to the scale and proximity of the proposed development. These findings stem from direct engagement, indicating that the impacts are concrete rather than speculative. However, without access to the complete assessment, it is impossible to scrutinise these findings properly or evaluate their significance in the decision-making process.

Furthermore, there is a clear perception that the proposal threatens community identity and cohesion, with "cultural loss" cited in the developer's findings. Regrettably, these serious impacts have not been adequately considered in the main application, nor have they been assigned the appropriate weight. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

The implications of this lack of transparency extend to the Environmental Impact Assessment process itself. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. By failing to provide the complete dataset, the application does not present a sound evidential basis necessary to weigh benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and avoid causing harm; however, the evidence available suggests that existing adverse effects have not been fully disclosed. Without the full assessment, it cannot be shown that the proposal complies with this policy.

The procedural ramifications are considerable. The competent authority is unable to perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission signifies a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual and landscape impacts of the proposal is inadequate and does not capture the extent of change or the sensitivity of the local environment. The coastline of West Lewis is marked by its open Atlantic horizon, undeveloped character, and a strong sense of remoteness. The placement of large-scale turbines near the shoreline would introduce a continuous industrial presence, significantly altering the character of the area and leading to a permanent change in the landscape.

The application fails to convey the true scale of the visual changes that would occur.

The turbines, due to their size and proximity, would dominate the views from residential areas, historic sites, and popular coastal locations. This dominance would negatively affect visual amenity and detract from the area's naturalness and sense of remoteness. The assessment does not sufficiently highlight the significance of this impact in such a sensitive landscape.

Methodological issues also arise from the choice and presentation of visual viewpoints. Evidence indicates that the selected viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially regarding important cultural heritage sites and valued landscapes. This raises concerns that the visual impact may have been underestimated, challenging the reliability of the assessment.

Another critical shortcoming is the lack of evaluation of the interconnectedness between landscape, seascape, and cultural heritage. Key sites like the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape that visually and spatially connects to the Atlantic horizon. The assessment fails to consider these sites as interconnected assets, which leads to an incomplete understanding of the impacts on their settings and cultural significance.

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

From a policy standpoint, the proposal is at odds with National Planning Framework 4, which aims to protect natural places and historic assets. The proposed changes are inconsistent with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a thorough worst-case scenario analysis weakens any assertions of compliance with policy.

Moreover, the identified impacts cannot be mitigated effectively. Given the turbines' scale, height, and proximity, their presence would be overwhelming and unavoidable. The resultant changes are fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

In summary, the assessment does not accurately depict the scale of impact, the sensitivity of the environment, or the interconnectedness of the landscape and heritage. These shortcomings hinder a dependable evaluation and strongly suggest that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The current application presents an incomplete assessment of construction and pollution risks, failing to deliver the necessary detail to adequately evaluate the potential environmental impacts. It involves significant seabed preparation and installation activities in a high-energy Atlantic setting; however, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention

Plans included. Instead, the proposal depends on mitigation and contingency measures that are to be formulated after consent is granted, thus hindering any substantive evaluation of their potential effectiveness or adequacy.

This reliance on unspecified future measures raises considerable concern, especially in light of the sensitive nature of the receiving environment. The coastline of West Lewis is home to clean coastal waters and crucial habitats that are susceptible to disturbance and contamination from sediment. Although the application acknowledges risks such as sediment mobilisation and the possibility of accidental spills involving chemicals or oil, it does not sufficiently outline the strategies to prevent, control, or monitor these occurrences.

Further uncertainty arises regarding the size and dynamics of sediment plumes that may result from the seabed disturbance and the installation of cables. The lack of robust modelling and explicitly defined management strategies renders it impossible to ascertain the potential extent, duration, or ecological consequences of these impacts. This uncertainty also extends to effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent has been granted, the application obstructs the evaluation of whether suitable safeguards are in place for responding to pollution incidents. This deferral introduces procedural risks and diminishes the capability of the competent authority to appraise environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the stipulations set forth by the Environmental Impact Assessment regime. Significant effects and proposed mitigations should be assessed prior to consent, and without this critical information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements that pertain to environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts culminate in an assessment that is materially deficient. These deficiencies prevent a thorough evaluation of construction and pollution risks, reinforcing the assertion that the application remains incomplete.

FISHERIES AND MARINE LIFE

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

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

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over a prolonged period is likely to create disturbances that reach large distances, which may adversely affect species such as dolphins. The predicted disruption to a considerable portion of the local bottlenose dolphin population raises profound concerns, yet the application downplays these effects without providing sufficient supporting evidence.

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

Moreover, there is no evaluation of how this lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly

concerning as the significance of dark skies is paramount to the area's identity and has implications for emerging tourism sectors like astro-tourism. The absence of these assessments results in a considerable gap in the overall evaluation of landscape and environmental impacts.

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

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

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

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

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

TOURISM

The application acknowledges that 86% of visitors to the Isle of Lewis are attracted by its scenery. However, it does not provide a quantified assessment of how the proposed large-scale offshore infrastructure would impact visitor numbers, behaviour, or the overall economic contribution of tourism. This is particularly concerning given that tourism has grown significantly, 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. The lack of analysis regarding how the industrialisation of the seascape and the potential loss of environmental quality would affect Tourism Gross Value Added and the wider economic resilience is alarming. Without such a thorough examination, it remains unclear whether this development would yield a net economic benefit or jeopardise an already established and expanding sector.

Moreover, the assessment neglects to consider the critical role of environmental quality in sustaining tourism. The unspoiled landscapes and dark skies are essential for enhancing visitor experience and fostering emerging markets, such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further exacerbates this issue, creating a considerable void in understanding the potential impacts on a recognised and burgeoning part of the local economy.

In an island community with limited economic diversification, the failure to evaluate the impacts on tourism raises significant concerns regarding employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been addressed as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, especially regarding economic impact and the necessity to illustrate net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to assess the economic ramifications of the proposal.

Collectively, the deficiencies in quantifying tourism impacts, evaluating the environmental factors influencing visitor behaviour, and acknowledging the island's economic dependency culminate in a substantial evidential gap. This significantly undermines the ability to conduct a robust evaluation of the economic effects and leads to the conclusion that the application is fundamentally incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal is fundamentally flawed, failing to meet the requirements of sustainable development as defined by statutory duties, national policy, and evidential standards. It replicates the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. This current application is put forth under a stronger policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are critical deficiencies in the evidential basis for the determination of this application. It lacks comprehensive baseline data, utilises an undefined design envelope, and depends on unspecified mitigation measures. Furthermore, significant impact pathways have been omitted from the assessment, including effects on nocturnal wildlife, the implications of full onshore infrastructure, and impacts on tourism. The Environmental Impact Assessment is therefore incomplete and fails to adequately convey the likely significant effects or residual impacts.

Additionally, procedural shortcomings are evident. The absence of a compliant Island Communities Impact Assessment violates statutory duties under the Islands (Scotland) Act 2018. There is also a significant omission regarding the full disclosure of the Social

Impact Assessment. Such deficiencies impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

This proposal is in direct violation of National Planning Framework 4, which requires the protection of biodiversity, natural environments, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable and fails to provide evidence of a net economic benefit due to a lack of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately evaluated, leaving unclear the implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold necessary to demonstrate that adverse effects can be excluded beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and 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, the loss of dark skies, disruption of cultural and visual relationships, and adverse effects on tourism represent permanent impacts that cannot be satisfactorily mitigated.

In summary, the application is 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 invoke the necessary regulatory provisions to obtain 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: 0CC6E4B3

Member of the public 941

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The concerns raised stem from a thorough examination of the Environmental Impact Assessment Report and associated documents, highlighting significant planning, environmental, cultural, and procedural shortcomings. The proposed development is situated off the west side of the Isle of Lewis, a region known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The size, location, and design of the project raise critical questions about its alignment with statutory obligations, national policy, and the principles of sustainable development.

The application is lacking in sufficient evidential support for a lawful determination. Essential environmental data is absent, baseline information is sparse and inconsistent, and key components of the proposal are not clearly defined. The flexible design framework used inhibits a proper understanding of potential significant effects, and the reliance on unspecified mitigation measures prevents any assessment of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community effects, and assertions of negligible or insignificant impacts are not backed by solid evidence.

There are evident and serious conflicts with 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 adequately demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests necessary for consent and compromise the ability of the competent authority to conclude that the development is acceptable according to policy.

The unprecedented scale of the project raises significant issues, with large turbines proposed in close proximity to the shoreline, which could have substantial implications for landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. Under these conditions, the precautionary principle should be applied.

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 absence of a structured and evidence-based assessment of alternatives is a serious concern that undermines the integrity of the Environmental Impact Assessment

regime. The application fails to provide a comprehensive comparison of potential offshore locations, development scales, or design configurations that could have been less harmful. Instead, it offers a narrative account detailing the evolution of the project, without showing that the developer has genuinely considered more environmentally friendly options, particularly those that could involve placing turbines further offshore. Given the significance of the West Lewis coastline, the proximity to shore plays a crucial role in determining impacts. This lack of analysis prevents any conclusion that the proposed siting is indeed the least damaging option available.

The inadequacies are further evident in the cable routing and landfall assessment, where the evidence suggesting that alternative routes have been explored is insufficient. This oversight includes sensitive areas with cultural and spiritual significance, such as Barvas Cemetery. The failure to implement a clear avoidance strategy and the absence of comparative analysis indicate a reliance on post-design mitigation measures rather than proactive measures designed to minimise harm.

Consequently, the application does not adequately demonstrate that environmental harm has been mitigated through careful site selection, layout, and routing of infrastructure. This neglect breaches the established mitigation hierarchy and leaves the competent authority unable to ascertain whether less damaging alternatives exist. Without a thorough assessment of alternatives, it cannot be claimed that the proposal is a sustainable or compliant solution.

From a policy standpoint, these deficiencies compromise adherence to the National Planning Framework 4, particularly regarding the safeguarding of natural spaces, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a significant omission, ultimately leading to the conclusion that the application has not undergone sufficient evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed application is seriously flawed in its assessment of marine ecology and protected species, leading to an incomplete and unreliable understanding of the ecological receptors in the West Lewis coastal environment. This area is known for its sensitivity and biological activity, yet the baseline data presented is insufficient. The methodologies employed do not effectively capture key aspects such as species presence, behaviour, and habitat use, undermining the assessment's ability to evaluate potential impacts accurately.

One significant oversight involves otters, classified as a European Protected Species. The application fails to adequately recognise and evaluate the otters' active use of coastal regions for foraging and movement. By not considering their core foraging range and behavioural patterns, the potential effects of construction disturbances, noise, and increased activity have not been thoroughly examined. This deficiency raises questions about the validity of conclusions drawn regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks is compromised by the use of aerial surveys, which introduces substantial detection bias, particularly in Atlantic conditions. This method is likely to result in an underestimation of their presence, especially when compared to established land-based observations that suggest these waters are frequently used by basking sharks. The failure to incorporate or adequately consider such data further contributes to an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological shortcomings mean that any conclusions regarding negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of sufficient baseline data also inhibits a meaningful assessment of cumulative and indirect impacts, including variations by season and broader ecosystem interactions. This creates uncertainty about the actual risks facing 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, given that protected species have not been appropriately identified or assessed. The resulting uncertainty prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, it is not lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the development's impact on seabirds is fundamentally flawed. It presents significant gaps in evidence and contains internal inconsistencies that undermine its findings. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to demonstrate adequately that these species will not be adversely affected. Key foraging areas and migratory pathways are situated near the development, yet the assessment does not thoroughly evaluate risks related to displacement, collision, or habitat loss.

There is a critical contradiction within the application itself. While the developer asserts that there will be no significant adverse effects, they simultaneously submit a Habitats Regulations derogation case, which is only necessary if 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 proof that seabirds linked to protected sites, such as

the Lewis Peatlands and St Kilda, will be unaffected. The significance of these feeding grounds is inadequately acknowledged, and the reliance on modelling approaches introduces uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies used may underestimate mortality rates, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Placing turbines within a recognised migratory corridor adds another layer of risk. This placement effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of ongoing mortality in this corridor have not been sufficiently assessed, nor have 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, data gaps, and modelling flaws means that the required standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and renders the conclusion in support of consent unlawful.

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

In summary, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These issues hinder a robust evaluation of impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interlinked. Instead of appreciating heritage as an evolving entity with ongoing social, cultural, and spiritual significance, the application adopts a simplistic view that treats it as a collection of isolated, static assets.

There is a critical shortcoming in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are approached. These sites are active areas for burial and spiritual observance, yet the assessment overlooks their current use, meaning, and the potential impacts of development on their environment. This misrepresentation leads to an incomplete understanding of cultural implications, neglecting their integral role in community life.

Moreover, the assessment fails to address intangible cultural heritage elements,

including the Gaelic language and traditions, as well as the long-standing relationship the community has with the coastal environment. These components are essential to the area's identity but are conspicuously absent from the evaluation, resulting in a significant gap. Without acknowledging these factors, the true cultural impact of the development remains obscured.

Concerns also arise regarding community rights and participation. The Gaelic-speaking population embodies a unique cultural identity characteristic of Indigenous Peoples; however, there has been no process for Free, Prior and Informed Consent. This lack of meaningful engagement compromises the assessment's validity and disregards established principles of community involvement in matters affecting cultural and environmental interests.

Compounding these issues is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without such an assessment, the competent authority is unable to fulfil its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission is a significant barrier to lawful decision-making.

From a policy standpoint, these shortcomings conflict with National Planning Framework 4, particularly regarding the safeguarding of historic assets and locations. The neglect of both tangible and intangible heritage, along with the disregard for living cultural practices, clearly diverges from established policy requirements.

Ultimately, the absence of a thorough evaluation of living heritage, intangible cultural values, community rights, and statutory responsibilities leads to a substantial evidential void. The cultural ramifications of the proposed development have not been adequately assessed, and the application fails to deliver a solid foundation for understanding the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full Social Impact Assessment has not been published, resulting in a significant evidential gap that hinders the public and the competent authority from grasping the complete extent of social risks identified by the developer’s research. Despite the developer commissioning a Social Impact Assessment that included focus groups with local residents, the lack of transparency around the full report obstructs proper scrutiny of its findings.

Available summaries reveal that residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement and are thus grounded in reality, not speculation. However, the inability to review the full assessment limits the capacity to evaluate the significance of these effects in the decision-making process.

The proposal is viewed as a threat to community identity and cohesion, with indications of “cultural loss” highlighted in the developer’s own findings. Nevertheless, these

adverse impacts have not been adequately integrated into the main application, which is a serious oversight. The non-disclosure of the comprehensive Social Impact Assessment obscures the true human and social costs associated with the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, especially when community character and functioning are at stake. The application fails to provide a complete evidential basis for assessing the balance between benefits and potential harm, largely due to the absence of the full dataset.

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

The procedural ramifications are considerable. The competent authority is unable to carry out a thorough socio-economic and health evaluation without the full Social Impact Assessment. This omission represents a material gap in the application and a failure to satisfy the evidential requirements set forth by the Environmental Impact Assessment regime.

In conclusion, the combination of the withheld full Social Impact Assessment and evidence of existing negative impacts renders the assessment both incomplete and unreliable. This situation hampers a lawful determination and underscores the inadequacy of information supporting the application.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed introduction of large-scale turbines near the West Lewis coastline would lead to a continuous industrial presence, fundamentally changing the area's character defined by its open Atlantic horizon and undeveloped nature. This alteration would result in a permanent transformation of the landscape, which has not been adequately assessed in terms of visual impacts.

The application fails to represent the magnitude of the visual change. The close proximity and scale of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, impacting visual amenity and diminishing the naturalness and sense of remoteness in this sensitive landscape. The assessment does not convey the level of this impact or its significance adequately.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that some viewpoints may not represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This could result in an understatement of the

visual impacts, calling the reliability of the assessment into question.

Another deficiency is the lack of evaluation regarding the interconnectedness of landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that visually and spatially relates to the Atlantic horizon. Instead of recognising this interdependence, the assessment treats these sites as isolated, resulting in an incomplete evaluation of the impact on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This signifies 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 directly conflicts with National Planning Framework 4 concerning the protection of natural places and historic assets. The anticipated changes are incompatible with safeguarding landscape character, visual amenity, and the setting of culturally significant sites. Moreover, the lack of a comprehensive worst-case assessment further undermines claims of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. The turbines' scale, height, and proximity would ensure their presence is dominant and unavoidable. The resulting changes would thus be fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation measures.

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 shortcomings hinder a reliable evaluation and support the conclusion that the proposal is incompatible with the protection of the landscape.

CONSTRUCTION AND POLLUTION RISKS

The evaluation of potential environmental impacts linked to construction and pollution is insufficient and lacks the necessary detail for a thorough assessment. The proposed project entails significant seabed preparation and installation activities within a challenging Atlantic setting. However, the application fails to present comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that are set to be developed after consent, which hinders any meaningful appraisal of their potential effectiveness or adequacy.

The reliance on undefined future actions is especially troubling considering the delicate nature of the surrounding environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to contamination and sediment disruption. Although the application acknowledges risks associated with sediment mobilisation and potential chemical or oil spills, it does not adequately

outline strategies for their prevention, control, or monitoring.

There is also ambiguity concerning the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management approaches, it is impossible to gauge the ecological effects, duration, or extent of these impacts. This uncertainty extends to marine species and habitats deemed sensitive within the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. The decision to delay contingency planning until after consent is granted obstructs the evaluation of whether suitable protections are in place to handle pollution incidents. This creates procedural risks and diminishes the ability of the competent authority to scrutinise environmental protection measures at the critical point of determination.

From a regulatory standpoint, postponing essential environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment framework. Significant effects and mitigation strategies must be thoroughly assessed before consent is granted, and absent such information, a lawful decision cannot be reached. The application also fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts culminate in a materially deficient assessment. These inadequacies obstruct a rigorous evaluation of construction and pollution risks, further reinforcing the argument that the application remains incomplete.

FISHERIES AND MARINE LIFE

The proposal significantly undermines the assessment of fisheries and marine life, failing to provide a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry. However, the application does not demonstrate that these vital habitats and activities can be preserved without causing considerable disruption.

A critical concern is the assumption made by the application that fishing activities can be displaced without adverse effects. There is a lack of evidence regarding the availability, accessibility, or capacity of alternative fishing grounds to support the additional strain that displacement would create. This gap in the assessment is crucial, as it risks overfishing in other areas and could have broader economic repercussions for the local fishing fleet. Without a solid evidence base, understanding the impacts on fisheries and livelihoods is not feasible.

Additionally, the proposal poses significant risks to marine species, particularly due to the underwater noise produced during construction. The high-energy hammer piling

anticipated over an extended timeframe is likely to cause disturbances across considerable distances, impacting species such as dolphins. The predicted disturbance to a notable portion of the local bottlenose dolphin population raises urgent concerns, yet the application minimizes these potential effects, lacking adequate supporting evidence.

There exists an inconsistency within the application where the necessity for licenses to permit harm to European Protected Species is acknowledged, while simultaneously describing the impacts as negligible. This contradiction casts doubt on the credibility of the assessment and raises concerns regarding adherence to the Habitats Regulations, especially where harm is expected to a degree necessitating legal authorisation.

Moreover, the assessment neglects to address cumulative impacts 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 conformity with National Planning Framework 4 or the National Marine Plan. It does not illustrate that the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thus preventing any conclusion regarding the sustainability of the proposal.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed development encompasses both offshore turbines and onshore infrastructure, which are inherently interconnected. However, the current assessment fails to consider them as a single integrated project, leading to a fragmented analysis that does not accurately reflect the comprehensive environmental and socio-economic impacts. The onshore components consist of cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and a habitat of ecological sensitivity. The application does not deliver a thorough evaluation of these impacts, thus hindering an understanding of the overall environmental footprint of the project.

Moreover, the application’s exclusion or postponement of the assessment of onshore impacts obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; yet, the distinct assessments of offshore and onshore elements result in an incomplete understanding of 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 safeguarded by policy. The application fails to demonstrate that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented, thereby creating a significant evidential gap regarding biodiversity protection.

Concerns also arise regarding carbon balance, as disturbances to peatland can release stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this matter or prove that the overall carbon balance remains favourable. Furthermore, routing infrastructure through active croft land may lead to 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 issues concerning both deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project in its entirety and to ensure the protection of peatlands, habitats, and land use interests is at odds with the National Marine Plan and the National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further compromises the credibility of the application. Collectively, the disjointed assessment of project components, the lack of a thorough evaluation, and the absence of 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 lack of assessment regarding dark skies and nocturnal wildlife within the Environmental Impact Assessment is a significant shortcoming. The proposed development along the West Lewis coastline introduces permanent red aviation lighting, which is visible over extensive distances and creates a continuous and intrusive "wall of light" effect across the western horizon. This alteration fundamentally impacts the night-time environment, which is characterised by exceptionally dark skies that contribute to the area's environmental quality, cultural identity, and tourism value.

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

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

This omission is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to reflect nocturnal activities and associated hazards. Additionally, species like Kittiwakes, known to forage or migrate at night, are similarly at risk of disorientation from artificial lighting, yet this potential threat has not been evaluated. The lack of site-specific night-time data creates a critical deficit in understanding the ecological impacts.

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

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

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

TOURISM

The application presents a significant evidential gap by failing to adequately assess tourism impacts, which are vital for the Isle of Lewis economy. Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the assessment does not quantify how large-scale offshore infrastructure would affect visitor numbers, behaviour, or the overall economic contribution to the region.

The tourism sector is fundamentally reliant on the natural assets of the area, including its wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application acknowledges that 86% of visitors are attracted by scenery, it fails to consider the potential impact of industrialising the seascape and the associated loss of environmental quality on Tourism Gross Value Added and the wider economic resilience of the community. Without such critical analysis, it remains unclear whether the proposed development would yield a net economic benefit or harm an already established and growing sector.

Moreover, the assessment overlooks the crucial role that environmental quality plays in supporting tourism, particularly regarding unspoiled landscapes and dark skies that enhance visitor experiences. The lack of a Dark Skies Assessment further highlights this deficiency, leaving a void in the understanding of impacts on emerging markets,

including nature-based tourism and astro-tourism.

In an island community characterised by limited economic diversification, the inadequate evaluation of tourism impacts poses broader implications for employment, local businesses, and overall community sustainability. The absence of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been adequately addressed, contrary to the requirements set out in the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate alignment with the National Planning Framework 4, particularly concerning economic impact and the necessity to illustrate net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector, and fails to provide enough evidence for the competent authority to properly assess the economic consequences of the proposal.

In summary, the combined failures to quantify tourism impacts, assess environmental influences on visitor behaviour, and recognise the island's economic dependency culminate in a significant shortfall in the analysis, undermining the robustness of the evaluation of economic effects and 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 standards of sustainable development as outlined by statutory duties, national policy, and evidential criteria. This application revisits the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. It is now presented under a strengthened policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps in baseline data render the application inadequate and unreliable for determination. The use of an undefined design envelope, reliance on unspecified mitigation measures, and the omission of significant impact pathways—such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—result in an incomplete Environmental Impact Assessment. This incompleteness obstructs a thorough understanding of likely significant effects and residual impacts.

Moreover, there are evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches the statutory obligations outlined in the Islands (Scotland) Act 2018. Additionally, the failure to disclose the full Social Impact Assessment is a material omission that hinders the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal is also incompatible with National Planning Framework 4, as it does not adequately demonstrate protection of biodiversity, natural places, or cultural heritage.

It fails to prove that health and wellbeing impacts are acceptable and lacks evidence of net economic benefit due to insufficient tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals, some of which are internally inconsistent, do not meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle and prevents a lawful conclusion regarding the acceptability of impacts.

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

Considering these factors, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, coupled with policy conflicts and unresolved environmental risks, impede a lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or employ the relevant regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

I object to this proposed windfarm in the strongest terms. I don't believe the consultation has been adequate, nor do I believe it has been honest or that the proposed developers are being honest. They are saying impacts will be low in areas they cannot possibly know about because research has not been done to prove there will be no impact.
The risk to the Atlantic Salmon alone is massive. I know from my work as a journalist that research has been carried out which found Atlantic Salmon - an endangered species – from the renowned Langabhat fisheries system track straight through the proposed N4 site, on their migratory route to colder waters, but the developers have apparently not taken cognisance of this in their impact assessments. All the salmon routes from the west side of Harris and Lewis, with multiple sporting estates affected, are going to be going through this area, and hitting this population of fish could have a massively detrimental effect on an island industry as well as an endangered species.
In general, this development is far too big and far too close and I question how on earth it appeared in the Scotwind plan anyway? It's an outlier in the sense that it is an inlier - it is so far inshore. The turbines are huge. There are going to be loads of them. It will have a massively detrimentaal effect of the health and wellbeing of people who live in the area, potentially impact clusters of Gaelic-speaking communities by forcing people to move away and will, I fear, make people sick. It will also make them sick to their spirit

and negatively impact any sense of community empowerment, by making people feel they were utterly powerless in the face of a big takeover and a massive imposition. They will disempowered in the extreme and steamrollered by big business. If this was a green project that was proportionate, it would be an entirely different matter.
This will also hit tourism and the cultural sector like TV and film production, because it's going to be so visual and impact landscapes on the west side such as the historic Gearrannan village, which is often used in productions.
Economically, Lewis and Harris often struggle and this will impact so many sectors.
This will hurt the island and are ability to do for ourselves, increasing our need for state investment and support, while giving the profits to big business.
For all these reasons and plenty more, I object.

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: E4F189CD

Member of the public 942

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

Dear Sir/Madam

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

A thorough review of the Environmental Impact Assessment Report and its supporting documentation reveals that the application does not provide an adequate evidential basis for lawful determination. Key environmental data is absent, baseline information appears limited and inconsistent, and several critical aspects of the proposal are not clearly defined. The use of a flexible design framework hampers understanding of likely significant effects, and reliance on unspecified mitigation measures raises concerns about their potential effectiveness. Consequently, the documentation fails to facilitate a complete or informed assessment of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Furthermore, there are distinct and substantive conflicts with policy. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These inconsistencies directly challenge the statutory tests required for consent and weaken the competent authority's ability to ascertain the development's acceptability in policy terms.

The unprecedented scale of the proposal, involving large turbines situated in close proximity to the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. Together, the lack of sufficient information, reliance on undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate and fails to deliver a comprehensive, transparent, or trustworthy account of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, lacking firm commitments to specific turbine dimensions, layouts, or configurations, generates considerable uncertainty. This uncertainty compromises the assessment's integrity and obscures the actual impacts that the development may produce, thereby preventing both the public and the competent authority from grasping the true extent of environmental effects.

The application leans heavily on mitigation measures, monitoring strategies, and management plans that remain undefined. Consequently, consent is sought under the premise that any environmental harm will be remedied later, obstructing any meaningful evaluation of their effectiveness or assessment of residual impacts. This postponement of crucial information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation are clearly identified prior to determination.

Moreover, there are notable evidential shortcomings, such as gaps in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, particularly where conclusions suggest negligible or non-significant effects without robust 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.

As a result, the application does not satisfy the evidential threshold mandated by the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, including obligations related to biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, 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 unreliable and incomplete. These shortcomings obstruct 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 evaluation of marine ecology and protected species associated with this application is significantly lacking, failing to offer a complete and trustworthy understanding of the ecological receptors within the West Lewis coastal area. This marine environment is both highly sensitive and biologically active, yet the baseline

data presented is incomplete. The methodologies employed do not sufficiently capture the presence, behaviour, and habitat utilisation of various species, which compromises the ability to assess potential impacts reliably.

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The 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 West Lewis coastline should be recognised as a living cultural landscape where environment, language, tradition, and community are interwoven. However, the assessment of cultural heritage and community identity is fundamentally inadequate. It adopts a reductive approach by treating heritage as isolated, static assets, ignoring their ongoing social, cultural, and spiritual functions within the community.

Culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are active places of burial and spiritual practice. Nonetheless, these locations have been mischaracterised as static features, with the assessment failing to consider their continued use and the development's impact on their settings. This oversight leads to an incomplete evaluation of cultural effects and neglects their importance in community life.

Moreover, the assessment disregards intangible cultural heritage, including the Gaelic language and traditions, along with the long-standing relationship between the community and the coastal environment. These elements are vital to the area's identity but are entirely omitted from the evaluation, representing a significant gap. Without incorporating these factors, the true cultural impact of the development cannot be adequately understood.

The absence of meaningful engagement with the Gaelic-speaking population, who possess a distinct cultural identity and characteristics of an Indigenous People, raises serious concerns about community rights. No process of Free, Prior and Informed Consent has been undertaken, undermining the legitimacy of the assessment and violating established principles of participation regarding decisions that affect cultural and environmental interests.

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

From a policy standpoint, these shortcomings place the proposal in direct conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, alongside the failure to acknowledge living cultural practices, signifies a clear breach of policy requirements.

Collectively, these failures to assess living heritage, intangible cultural value, community rights, and statutory obligations lead to a significant evidential gap. The cultural impacts of the development have not been properly evaluated, and the application lacks a sufficient foundation for determining the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's failure to publish the full Social Impact Assessment is a significant evidential gap that hinders both public understanding and the ability of the competent authority to evaluate the potential social risks associated with the proposal. While the developer did commission this assessment, which included focus groups with local residents, the lack of transparency surrounding its findings raises serious concerns.

Available summaries highlight that residents are already feeling measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement and are not speculative. However, without access to the complete assessment, there is an impediment to properly scrutinising the findings and understanding their significance within the context of decision-making.

Moreover, there is evidence suggesting that the proposal is seen as a direct threat to community identity and cohesion, with “cultural loss” noted in the developer’s own findings. Yet, these impacts have not been adequately incorporated into the main application or assigned appropriate weight. The withholding of the full Social Impact Assessment obscures the true human and social costs linked to the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially where community character and functioning are at stake. The absence of the full dataset means that the application does not provide a complete evidential basis for assessing the balance between benefits and harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. It is essential for development to support positive health outcomes and avoid harm, yet the evidence available indicates existing adverse effects that have not been fully disclosed. Without the full assessment, compliance with this policy remains unproven.

The procedural implications are significant, as the competent authority cannot conduct a comprehensive socio-economic and health evaluation without the full Social Impact Assessment. This represents a material omission within the application and a failure to meet 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 adverse impacts, results in an incomplete and unreliable evaluation. This situation hampers a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual and seascape impacts surrounding the proposal is fundamentally inadequate and does not properly account for the scale of change or the sensitivity of the environment in question. The West Lewis coastline is characterised by its unspoiled Atlantic horizon, a largely undeveloped nature, and a profound sense of remoteness. Should large-scale turbines be introduced near the shoreline, their presence would create an overwhelming industrial landscape, irrevocably changing the character of the area and leading to a permanent transformation of the landscape.

Moreover, the application fails to accurately depict the extent of the visual alterations anticipated. The size and proximity of the turbines would dominate vistas from residential locales, historic sites, and popular coastal areas, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not adequately convey the significance of these impacts within the context of such a sensitive environment.

Concerns also arise regarding the methodology used in selecting and presenting visual

viewpoints. Evidence suggests that certain viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning significant cultural heritage sites and landscapes of high value. This risk implies that the visual impact may have been understated, casting doubt on the reliability of the assessment.

Another notable shortcoming is the lack of an evaluation of the interconnected nature of landscape, seascape, and cultural heritage. Key sites, including the Calanais Standing Stones and other Scheduled Monuments, are intrinsically linked to their wider landscape through visual and spatial relationships with the Atlantic horizon. The assessment treats these heritage assets in isolation, failing to acknowledge their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural significance.

The potential industrialisation of the seascape would disrupt these connections, thereby altering how heritage assets are perceived and diminishing their ties to the natural horizon. This signifies not just a visual concern, but a broader cultural and spatial detriment that has not been sufficiently addressed in the application.

From a policy standpoint, the proposal contravenes National Planning Framework 4 regarding the protection of natural environments and historic assets. The anticipated changes contradict the imperative to preserve landscape character, visual amenity, and the contextual integrity of culturally significant sites. The failure to conduct a comprehensive worst-case assessment further undermines any assertion of policy compliance.

Additionally, it is evident that the identified impacts cannot be adequately mitigated. Given the scale, height, and proximity of the turbines, their presence would be both prominent and inescapable. The resulting transformation is consequently fundamental and permanent, rather than something that could be reduced 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 deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is inconsistent with the safeguarding of this landscape.

FISHERIES AND MARINE LIFE

The evaluation of fisheries and marine life is inadequate and lacks a thorough assessment of ecological and socio-economic impacts. The application does not sufficiently protect or maintain the diverse marine ecosystem and the active fishing industry off the West Lewis coast.

A significant concern is the notion that fishing activity can be displaced without repercussions. The application fails to provide evidence that alternative fishing grounds are available, accessible, or able to handle increased pressure. This gap is critical, as

displacement could lead to overfishing in other areas and have broader economic effects on the local fleet. Without a clear, evidence-based analysis, the consequences for fisheries and local livelihoods remain unclear.

The proposal poses considerable risks to marine species, particularly from underwater noise generated during construction. Extended periods of high-energy hammer piling are likely to disturb large areas, impacting species such as dolphins. The anticipated disturbance to a notable proportion of the local bottlenose dolphin population raises significant concerns, yet the application minimises these effects without adequate supporting evidence.

There is an inconsistency within the application where it recognises the need for licences to allow harm to European Protected Species, while simultaneously describing such impacts as negligible. This contradiction undermines the assessment's credibility and raises doubts about compliance with the Habitats Regulations, particularly where anticipated harm may require legal authorisation.

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

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

In summary, the lack of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the presence of internal inconsistencies render the assessment incomplete and untrustworthy. These shortcomings obstruct a comprehensive evaluation of the impacts 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 application fails to address the assessment of dark skies and nocturnal wildlife, which is a significant omission within the Environmental Impact Assessment. The West Lewis coastline is notable for its exceptionally dark skies, a crucial aspect of environmental quality, cultural identity, and tourism value. The proposal introduces permanent red aviation lighting that will be visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon, which would fundamentally change the night-time environment.

There is no evaluation of the impact this lighting may have on visual amenity, landscape character, or the experiences of both residents and visitors. This lack of assessment is particularly concerning given the significance of dark skies to the area's identity and the emerging tourism sector focused on astro-tourism. The failure to consider these impacts indicates a clear gap in the overall landscape and environmental evaluation.

Moreover, the application does not include any assessment of 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 result in disorientation and an increased risk of collision. The absence of a lighting impact assessment or a phototaxis study means that there is no evaluation of how aviation lighting could potentially affect these species or contribute to increased mortality rates.

This omission is further exacerbated by the use of daytime survey data in the ornithological assessment, which fails to capture nocturnal activity and the associated risks. For example, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting; however, this risk has not been considered. The lack of site-specific night-time data creates a significant gap in understanding ecological impacts.

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

From a policy standpoint, these omissions conflict with National Planning Framework 4 regarding the protection of natural places and the quality of the environment. Additionally, they undermine the broader evaluation of landscape and seascape impacts, as the character of the night-time environment is integral to the overall ecological assessment.

In summary, 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 renders the application incomplete and incapable of supporting a lawful determination.

TOURISM

The application presents significant deficiencies in the assessment of tourism impacts, neglecting to evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has experienced notable growth, escalating from £65 million in 2017 to over £81.5 million, creating more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application does not model how the industrialisation of the seascape and the deterioration of environmental quality would impact Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it remains unclear whether the development would yield a net economic benefit or threaten an established and growing sector.

The assessment further neglects to examine the critical role of environmental quality in tourism, specifically how unspoiled landscapes and dark skies contribute to visitor experiences and emerging markets, such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a considerable gap in understanding the impacts on a recognised and expanding part of the local economy.

In an island community characterised by limited economic diversification, the failure to assess tourism impacts has broader implications for employment, local businesses, and community sustainability. Additionally, the absence 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 the National Planning Framework 4, particularly regarding economic impact and the obligation to illustrate net benefit. It also contradicts strategic objectives that identify tourism as a priority growth sector and lacks sufficient evidence for the competent authority to assess the economic ramifications of the proposal.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm 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

As someone who was born and raised in Lewis, this issue is deeply personal to me. I am heartbroken at the thought of our beautiful island being permanently altered by the construction of large-scale industrial turbines. The landscape here is not just scenery, it is part of our identity, our heritage, and our everyday lives.

While I recognise the importance of renewable energy and the role it plays in addressing climate change, I have significant concerns regarding the location, scale, and potential impacts of this project on the local environment, community, and heritage. These concerns come from a place of lived experience and deep

connection to this land.

Firstly, the proposed development risks causing substantial harm to the unique and sensitive landscape of Lewis. The area is known for its natural beauty, peatlands, and biodiversity. Large-scale infrastructure, including turbines, access roads, and associated works, could lead to habitat loss, peat disturbance, and long-term environmental degradation. The release of stored carbon from peatlands is a particular concern, as it may undermine the very climate benefits the project aims to achieve.

Secondly, there are serious concerns about the visual impact of the development. The open, unspoiled landscape of Lewis is something I have grown up with and value immensely, and it is devastating to think it could be dominated by towering turbines. This landscape is a defining characteristic of the island's identity and an important asset for tourism. Industrial-scale structures could significantly alter the character of the area, affecting both residents' quality of life and the local economy.

In addition, I am concerned about the potential effects on local wildlife, including bird populations that may be at risk from turbine collisions and habitat disruption. A thorough and transparent ecological assessment is essential, and I am not confident that the current proposal sufficiently addresses these risks.

Community impact is another key issue. Developments of this scale can place strain on local infrastructure, disrupt daily life during construction, and create long-term changes that may not reflect the wishes of residents. It is crucial that local voices are meaningfully considered, and I urge decision-makers to carefully weigh community concerns.

Finally, I question whether alternative locations or less intrusive approaches have been adequately explored. Renewable energy development should be balanced with environmental protection and community wellbeing, and I am not convinced this proposal achieves that balance.

For these reasons, I respectfully request that this application be refused or, at the very least, subject to more rigorous review and reconsideration. I urge you to consider not only the environmental factors, but also the emotional, cultural, and long-term impact this development will have on those of us who call Lewis home.

Thank you for taking the time to consider my objection.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 21DE5AE2

Member of the public 943

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns regarding the scale, proximity, and design of this proposal raise serious issues about its compatibility with statutory requirements and national policy, particularly in terms of sustainable development principles.

Critical environmental data is notably absent, and there is a lack of adequate baseline information, which is both limited and inconsistent. Key aspects of the proposal remain undefined, compounded by the use of a flexible design framework that hinders a clear understanding of the likely significant effects. The reliance on unspecified mitigation measures casts doubt on their potential effectiveness, leaving the documentation insufficient to provide a comprehensive understanding of the environmental, cultural, or community impacts. Consequently, assertions of negligible or non-significant effects lack robust supporting evidence.

There are significant policy conflicts associated with this application. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The proposal fails to demonstrate adherence to national requirements for protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests necessary for granting consent and impede the competent authority's ability to deem the development acceptable in policy terms.

Furthermore, the unprecedented scale of the proposal raises alarming concerns regarding landscape capacity, visual dominance, and environmental impact, given the positioning of large turbines in close proximity to the shoreline. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance suggests that the application is incomplete and cannot support a lawful determination. Under these conditions, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies within the Environmental Impact Assessment Report are substantial and render it fundamentally unreliable. The absence of specific turbine dimensions, layouts, or configurations due to the use of a flexible Project Design Envelope

introduces a significant level of uncertainty. This lack of commitment prevents the application of a worst-case scenario consistently, which compromises the integrity of the assessment. Consequently, the impacts described may not accurately represent the final development, hindering both public comprehension and the ability of the competent authority to gauge the true environmental effects.

Moreover, the application hinges on mitigation measures, monitoring strategies, and management plans that have not yet been established. Seeking consent based on the promise of addressing environmental harm at a later date impedes any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the fundamental purpose of the Environmental Impact Assessment process, which mandates that significant effects and necessary mitigations be clearly identified before any determination is made.

Additionally, the report suffers from evidential shortcomings, which include gaps in baseline data and methodological limitations. The reliance on assumptions instead of site-specific evidence creates uncertainty surrounding the scale and significance of impacts. This is particularly concerning where conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot align with statutory requirements.

Due to these shortcomings, the application does not meet the evidential threshold established under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This raises concerns about the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal fails to comply with the requirements outlined in National Planning Framework 4, particularly those related to biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been comprehensively assessed or that appropriate safeguards are in place.

In summary, the reliance on an undefined design envelope, the lack of specified mitigation measures, and the gaps in baseline data collectively undermine the reliability and completeness of the Environmental Impact Assessment Report. These critical deficiencies mean that a lawful and thorough assessment of environmental effects cannot be conducted, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application lacks a comprehensive assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Rather than offering a reasoned comparison of viable alternatives based on their environmental effects, it provides a narrative of project development. This narrative does not adequately demonstrate that less harmful options have been properly identified,

assessed, and preferred over more damaging solutions.

There is a significant absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has thoroughly considered the option of placing turbines further offshore, which could potentially mitigate visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical role of proximity to shore in evaluating impact, the lack of such an analysis means that it cannot be concluded that the proposed siting is the least damaging option.

The shortcomings also pertain to cable routing and landfall assessment. There is inadequate evidence suggesting that alternative routes have been sufficiently explored to minimise impacts on sensitive receptors, including culturally and spiritually significant locations such as Barvas Cemetery. The failure to present a clear avoidance strategy and the absence of comparative analysis imply that mitigation by design has not been effectively implemented, relying instead on post-design measures for mitigation.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This deficiency indicates a failure to adhere to the established mitigation hierarchy, which inhibits the competent authority from assessing whether less harmful and more appropriate alternatives are available. In the absence of a robust alternatives assessment, it cannot be ascertained that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy undermines alignment with National Planning Framework 4, especially in terms of safeguarding natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment represents a significant omission, contributing to the conclusion that the application has not been thoroughly evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

One significant oversight involves otters, a European Protected Species, which have not been properly recognised or assessed in their use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to an inadequate evaluation of how construction disturbance, noise, and

increased activity could affect them. This lack of assessment undermines any assertions regarding the absence of significant effects on this species.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application has significant flaws in its ornithological assessment, which presents major gaps in evidence and inconsistencies that undermine its findings. The Isle of Lewis's west coast is home to internationally important seabird populations, many of which are already declining. However, the application fails to convincingly show that these species will not be negatively impacted. The development site is situated within critical foraging areas and migratory routes, yet the assessment does not thoroughly consider the risks of displacement, collision, or habitat loss.

There is a notable contradiction within the application. The developer claims that there are no significant adverse effects while also putting forward a Habitats Regulations derogation case, which is typically necessary when significant harm is anticipated. This inconsistency raises doubts about the assessment's reliability and suggests that its conclusions are not adequately backed by the evidence provided.

Furthermore, the assessment lacks sufficient proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unharmed. The importance of these feeding grounds is not fully addressed, and the reliance on

modelling introduces uncertainty, especially for species like Kittiwakes and Fulmars that are in serious decline. The methodologies used are likely to underestimate mortality, particularly given incomplete baseline data and a lack of understanding of behavioural responses.

The placement of turbines in a recognised migratory corridor adds another serious risk, creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The application does not properly evaluate the long-term consequences of ongoing mortality in this corridor or the potential impacts on species with relatively small global populations.

Regulatory compliance is also questionable, as the application does not meet the evidential standard required to assert that there will be no adverse effect on the integrity of protected sites. The contradictory conclusions, combined with data deficiencies and modelling constraints, indicate that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and inhibits a lawful decision in favour of consent.

Overall, the deficiencies identified reflect a failure to comply with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected puts the proposal at odds with national policy. These issues collectively render the assessment unreliable due to inconsistencies, methodological flaws, and insufficient evidence, ultimately leading to the conclusion that the application does not satisfy the statutory 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 vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. The application takes a narrow view, treating heritage as isolated, static elements and neglecting their ongoing social, cultural, and spiritual significance within the community.

Significant shortcomings are evident in the handling of culturally important sites like the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active burial grounds and spaces for spiritual practice, yet the assessment reduces them to static features without acknowledging their continued use, significance, and the potential impact of development on their surroundings. This misrepresentation leads to a partial evaluation of cultural effects and dismisses their integral role in community life.

Moreover, the assessment neglects intangible aspects of cultural heritage, such as the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These elements are vital to the identity of the area but are entirely missing from the evaluation, creating a significant gap. Ignoring these factors undermines the ability to fully understand the cultural impact of the proposed

development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity recognised as an Indigenous People, yet the process of Free, Prior and Informed Consent has not been undertaken. The lack of meaningful engagement calls into question the legitimacy of the assessment and fails to honour established principles of participation in matters affecting cultural and environmental interests.

A critical procedural failure is the omission 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 examine the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

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

In summary, the oversight of living heritage, intangible cultural values, community rights, and statutory obligations creates a considerable evidential gap. The cultural impacts of the development have not been sufficiently evaluated, leaving the application without a solid foundation to assess the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The absence of the full Social Impact Assessment significantly undermines the ability of the competent authority to conduct a thorough socio-economic and health evaluation. This omission is not merely procedural; it restricts the evidential framework required for assessing the proposal's impact comprehensively. Without access to the complete dataset, the application falls short of meeting the evidential standards established under the Environmental Impact Assessment regime.

Moreover, there is a troubling lack of transparency regarding social impacts, health, and wellbeing associated with the development. While the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This lack of disclosure creates a significant evidential gap, preventing both the public and the relevant authorities from grasping the full extent of social risks highlighted in the developer's research.

Available summaries reveal that residents are already experiencing notable stress, anxiety, and concern due to the size and proximity of the proposed development. These impacts are based on direct engagement, thereby affirming their validity rather than relying on speculation. Yet, the failure to release the comprehensive assessment stifles proper scrutiny of these findings and diminishes the capacity to assess their relevance

in the decision-making process.

The perception of the proposal as a threat to community identity and cohesion is also evident, with “cultural loss” identified in the developer's own findings. However, these serious impacts have not been adequately considered in the primary application or afforded the necessary weight. The withholding of the complete Social Impact Assessment obscures the real human and social costs tied to this development, thus failing to integrate these critical factors into the overall evaluation.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Effective development must foster positive health outcomes while minimising harm. Nevertheless, the existing adverse effects highlighted by the available evidence have not been fully acknowledged. Consequently, without the complete assessment, it cannot be substantiated that the application aligns with this policy.

In summary, the failure to disclose the full Social Impact Assessment, coupled with the evidence of already experienced adverse impacts, renders the evaluation both incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to support its approval.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development raises significant concerns regarding its impact on the landscape, seascape, and cultural heritage of the West Lewis area. The assessment provided does not sufficiently address the scale of the proposed changes or the sensitivity of the surrounding environment. The coastline is characterised by an open Atlantic horizon and an undeveloped, remote atmosphere. The installation of large-scale turbines near the shoreline would introduce a pervasive industrial element that fundamentally transforms the landscape in a permanent and irreversible manner.

Moreover, the magnitude of the visual change has not been adequately represented within the application. Given the size and proximity of the turbines, they would dominate views from residential areas and historic sites, as well as from popular coastal locations. This situation would significantly undermine visual amenity and diminish the area's essential qualities of naturalness and remoteness. The assessment fails to convey the true level of this impact, particularly within such a sensitive landscape.

Methodological issues have also been identified concerning the choice and presentation of visual viewpoints. Evidence indicates that the selected viewpoints may not effectively represent the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and valued landscapes. This oversight raises concerns that the extent of visual impact has been understated, compromising the credibility of the assessment.

Additionally, the application overlooks the vital connections between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a larger landscape context that is visually and spatially linked to the Atlantic horizon. Rather than acknowledging these interdependencies, the assessment treats these assets as isolated, leading to an incomplete understanding of the impacts on their context and cultural significance.

The industrialisation of the seascape would sever these critical relationships, altering how heritage assets are perceived and disrupting their connection to the natural horizon. This transformation represents not only a visual issue but also a broader cultural and spatial harm that has not been thoroughly evaluated in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4, which aims to protect natural environments and historic assets. The scale of the proposed changes is at odds with the need to preserve landscape character, visual amenity, and the settings of culturally significant locations. The lack of a comprehensive worst-case assessment further undermines the argument for compliance with established policy.

It is evident that the identified impacts are unlikely to be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be overwhelmingly dominant and unavoidable. Consequently, the resulting changes would be fundamental and permanent, rather than amenable to reduction through mitigation measures.

Overall, the assessment inadequately portrays the extent of the impact, the sensitivity of the environment, and the interconnectedness of the landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal's assessment of construction and pollution risks is fundamentally lacking and fails to provide the necessary detail for evaluating potential environmental effects. Significant seabed preparation and installation works are planned within a high-energy Atlantic environment; however, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans in place. Instead, the application relies on mitigation and contingency measures that would be developed after consent, which limits any meaningful assessment of their adequacy or effectiveness.

This reliance on unspecified future measures raises particular concerns in light of the sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks, including sediment mobilisation and accidental chemical or oil spills, it lacks sufficient detail on prevention, control, or monitoring strategies for these risks.

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

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether adequate safeguards are established to respond to pollution incidents. This situation introduces procedural risks and diminishes the ability of the competent authority to assess the effectiveness of environmental protection measures during the decision-making process.

From a regulatory standpoint, the postponement of critical environmental safeguards contradicts the requirements outlined by the Environmental Impact Assessment regime. Assessment of likely significant effects and mitigation measures must occur prior to granting consent, and in the absence of such information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application poses serious concerns regarding the assessment of marine life and fisheries, which appears fundamentally inadequate. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry. However, the application does not convincingly demonstrate how these critical uses and habitats can be protected against significant disruption.

A troubling aspect of the proposal is the assumption that fishing activities can be relocated without any repercussions. There is no evidence provided to confirm that alternative fishing grounds exist or that they would be accessible and capable of handling increased pressure. This is a significant omission, as forcing fishing displacement could lead to overfishing in other areas, ultimately threatening the livelihoods of the local fishing fleet. Without a thorough and evidence-based assessment, understanding the true impacts on fisheries and the communities dependent on them is impossible.

Moreover, the proposal presents considerable risks to marine species, particularly due

to underwater noise from construction activities. The prolonged use of high-energy hammer piling is expected to create disturbances that could affect marine life over extensive areas, including the local population of bottlenose dolphins. The application seems to downplay the predicted effects on these dolphins, despite the serious nature of the threat, lacking adequate evidence to support such minimisation.

There is a troubling inconsistency within the application regarding the need for licences for any harm to European Protected Species. While it acknowledges the requirement for such permits, it simultaneously describes these impacts as negligible. This contradiction seriously undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Additionally, the assessment does not adequately address the cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these interrelated effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic conditions tied to them.

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

In conclusion, the combination of insufficient evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the application render the assessment incomplete and unreliable. These shortcomings significantly hinder a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of assessments regarding dark skies and nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial for the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting that can be seen over long distances would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

The proposal fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly concerning given the vital role that dark skies play in the area's identity and the growth of emerging tourism sectors such as astro-tourism. The lack of consideration for these impacts creates a clear gap in the overall landscape and environmental assessment.

Moreover, there is no analysis of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and increased collision risks. The application lacks a lighting impact assessment or a phototaxis study, failing to address how aviation lighting may affect these species or contribute to increased mortality rates.

This issue is exacerbated by the reliance on daytime survey data for the ornithological assessment, which does not adequately capture nocturnal activity or related risks. Other species, such as Kittiwakes, that may forage or migrate at night are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data hinders the understanding of ecological impacts.

Without an evaluation of nocturnal impacts, it is impossible to determine if protected species or designated sites would be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be met, thereby invoking the precautionary principle and preventing a lawful determination.

From a policy standpoint, these omissions contradict the National Planning Framework 4 regarding the protection of natural spaces and environmental quality. They also weaken the broader assessment of landscape and seascape impacts since the character of night-time forms an essential element of the environment.

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

TOURISM

The assessment of tourism impacts is lacking and does not address the economic and social effects on a crucial part of the Isle of Lewis economy. The area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are essential to tourism. While the application notes that 86% of visitors are attracted by scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution.

Tourism has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, and supports more than 1,000 jobs, constituting up to 16% of the island's economy. Nevertheless, the application does not evaluate how the industrialisation of the seascape and loss of environmental quality would affect Tourism Gross Value Added or the broader economic resilience of the island. Without this analysis, it is unclear whether the development would provide a net economic benefit or harm an established and growing sector.

Moreover, the assessment neglects the importance of environmental quality in

promoting tourism. Unspoiled landscapes and dark skies are vital for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a significant gap in understanding the impacts on a growing segment of the local economy.

In an island community with limited economic diversity, the lack of an assessment of tourism impacts 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 evaluated as mandated by the Islands (Scotland) Act 2018.

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

In summary, the inability to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and recognise the island's economic dependence results in a significant evidential gap. This hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when measured against statutory duties, national policy, and evidential standards. The application echoes the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a significant concern. This new application is now put forth under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Significant gaps exist in the evidential basis provided for this application. The design envelope remains undefined, and the reliance on unspecified mitigation measures raises concerns. Furthermore, essential impact pathways—including effects on nocturnal wildlife, full onshore infrastructure, and tourism—have not been adequately addressed. Consequently, the Environmental Impact Assessment is incomplete, which inhibits a comprehensive understanding of the likely significant effects and residual impacts.

Procedural issues are also evident. The failure to submit a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as outlined in the Islands (Scotland) Act 2018. Additionally, the non-disclosure of the full Social Impact Assessment represents a material omission. These shortcomings hinder the competent authority from adequately evaluating the impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

This proposal directly contravenes the National Planning Framework 4. It does not sufficiently demonstrate protection for biodiversity, natural landscapes, and cultural heritage. It fails to indicate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, leaving potential impacts on peatlands, carbon balance, habitats, and crofting land obscured.

There are also significant uncertainties regarding environmental risks. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in some areas. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been reached, thereby invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of the impacts.

Moreover, the proposal will 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 will result in permanent effects that cannot be sufficiently mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The scale of deficiencies in information, along with conflicts with policy and unresolved environmental risks, precludes a lawful and evidence-based decision. The competent authority must either refuse consent based on these grounds or employ the relevant regulatory measures to compel the submission of the missing information.

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

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: 2CF9AC69

Member of the public 944

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 presents significant shortcomings and does not deliver a full or transparent overview of the potential environmental impacts of the proposal. The introduction of a flexible Project Design Envelope, which lacks firm

commitments to specific dimensions or configurations of turbines, creates considerable uncertainty. This uncertainty undermines the assessment's integrity and obscures the true environmental effects, preventing both the public and the competent authority from fully grasping the implications of the development.

Moreover, the application is heavily reliant on mitigation measures, management plans, and monitoring strategies that remain undefined at this stage. Seeking consent under the assumption that potential environmental damage will be managed later is unacceptable and hinders any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. The deferral of critical information to stages following consent contradicts the core objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies must be clearly established before any decision is made.

There exist substantial evidential gaps, including insufficient baseline data and methodological limitations, compounded by a reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of the impacts, particularly where conclusions of negligible effects are drawn without adequate supporting data. The lack of sufficient information prevents a comprehensive understanding of cumulative impacts and introduces scientific uncertainty that fails to align with statutory requirements.

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

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

ASSESSMENT OF ALTERNATIVES

The application presents a narrative account of project evolution rather than a structured, evidence-based comparison of alternatives. This lack of analysis is a significant shortcoming, as it does not demonstrate that less harmful options have been identified and assessed in preference to more damaging solutions. Specifically, there is an absence of a transparent comparison of offshore locations, development scales, and design configurations. The developer has not adequately considered the possibility of placing turbines further offshore, where impacts on visual aspects, ecology, and the coast would likely be mitigated. This is particularly crucial given the

sensitivity of the West Lewis coastline and the importance of proximity to shore in determining environmental impacts.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The 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 application presents a flawed ornithological assessment, characterised by significant gaps in evidence and internal inconsistencies that undermine its overall 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 fails to demonstrate convincingly that these species will not be adversely affected. Turbines are proposed within critical foraging areas and migratory pathways, yet the assessment does not adequately evaluate the implications of displacement, collision risk, or habitat loss.

A key contradiction arises within the application, as the developer claims there are no significant adverse effects while simultaneously making a case for Habitats Regulations derogation, which is typically required only when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that its conclusions are not firmly backed by the available 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 addressed, and the reliance on modelling techniques adds uncertainty, particularly for species such as Kittiwakes and Fulmars that are in severe decline. The applied methodologies are likely to underestimate mortality rates, particularly when baseline data is lacking and behavioural responses are not fully understood.

The positioning of turbines within a recognised migratory corridor introduces an additional and considerable risk, as it effectively creates a barrier within a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term consequences of sustained

mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold needed to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, alongside data gaps and modelling limitations, means that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle and prevents a lawful conclusion supporting consent.

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

In summary, the assessment is fundamentally unreliable due to internal inconsistencies, methodological flaws, and inadequate evidence. These issues impede a thorough evaluation of impacts and lead to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the proposed development fails to adequately consider the West Lewis coastline as a living cultural landscape, where the environment, language, tradition, and community are interconnected. The application approaches heritage in a reductive manner, treating it as a collection of isolated and static assets. This perspective ignores the ongoing social, cultural, and spiritual roles these heritage sites play within the community.

Significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are mischaracterised as static features despite being active places for burial and spiritual practice. This oversight fails to recognise their continued use and meaning, as well as the potential impact of development on their surroundings. Consequently, the evaluation of cultural effects is incomplete, disregarding the integral role these sites have in community life.

Moreover, the application neglects to address intangible cultural heritage, including the Gaelic language and traditions, which are essential to the identity of the area. The absence of these elements from the assessment is a critical omission, as it prevents a comprehensive understanding of the cultural impact of the development.

There are also serious concerns regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity, with characteristics that align with those of Indigenous Peoples. However, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment’s legitimacy and does not adhere to established principles for participation in decisions that affect cultural and environmental interests.

Furthermore, a vital procedural flaw is the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

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

Overall, the neglect of living heritage, intangible cultural values, community rights, and statutory obligations leads to a substantial evidential gap. The cultural impacts of the development have not been properly assessed, and the application does not sufficiently justify the potential cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's failure to publish the complete Social Impact Assessment is a significant oversight that undermines the entire evaluation process. While they conducted focus groups with local residents, the absence of the full report creates a critical evidential gap, which hampers both public understanding and the competent authority's ability to assess the social risks identified through the developer’s research. This lack of transparency severely impairs the Environmental Impact Assessment, making it impossible to fully grasp the social, economic, and health implications of such a large-scale development.

Residents have already reported measurable levels of stress, anxiety, and concern linked to the proposal's size and proximity, illustrating the immediate impact on the community. These findings are grounded in direct engagement, not speculation, yet the incomplete disclosure of the assessment prevents thorough scrutiny and diminishes the importance of these impacts in the decision-making process.

Additionally, the proposal poses a perceived threat to community identity and cohesion, with indications of "cultural loss" present in the developer’s findings. Regrettably, these impacts have not been adequately reflected in the application or given the necessary consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development, leaving the application deficient in presenting a complete evidential basis to balance benefits against potential harm.

From a policy standpoint, the application does not show compliance with National Planning Framework 4 regarding health and wellbeing. It is essential that developments promote positive health outcomes and mitigate harm, yet the evidence available points to existing adverse effects that remain undisclosed. Without the complete assessment, it is impossible to demonstrate adherence to this policy.

The procedural implications of this deficiency are considerable. The competent authority is unable to perform a comprehensive socio-economic and health evaluation in the absence of the full Social Impact Assessment, representing a material omission within the application. Overall, the combination of the non-disclosure of this critical assessment and the evidence of existing adverse impacts results in an incomplete and unreliable evaluation. This not only prevents a lawful determination but also reinforces the argument that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application for large-scale turbines near the West Lewis coastline raises serious concerns about the assessment of seascape, landscape, and visual impacts. The coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a strong sense of remoteness. The introduction of these turbines would create a dominant industrial presence, fundamentally changing the landscape and leading to a permanent transformation.

The assessment of visual change is insufficient. The scale and closeness of the turbines would dominate views from residential areas, historic sites, and popular coastal spots. This would directly impact visual amenity and diminish the qualities of naturalness and remoteness. Furthermore, the assessment does not adequately communicate the significance of these impacts, particularly in relation to the sensitive nature of the landscape.

Methodological issues have also been identified regarding the selection and presentation of visual viewpoints. There is evidence suggesting that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially concerning important cultural heritage sites and valued landscapes. This risk of underestimating visual impact raises questions about the assessment's reliability.

Another significant concern is the lack of consideration for the interconnectedness of landscape, seascape, and cultural heritage. Key sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape that visually and spatially connects to the Atlantic horizon. Treating these assets as isolated overlooks their interdependence and leads to an incomplete understanding of how the proposed development would affect their context and cultural importance.

The potential industrialisation of the seascape threatens to sever these connections, altering how heritage assets are perceived and disrupting their relationship with the natural horizon. This represents a deeper cultural and spatial harm that the application fails to adequately address.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly regarding the protection of natural spaces and historic assets. The extent of the proposed changes 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 diminishes any claim of compliance with policy.

It is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would create an unavoidable dominance. Therefore, the resulting changes are fundamental and permanent, not reducible to acceptable levels through mitigation efforts.

Overall, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation, reinforcing the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks is significantly lacking, which hampers the ability to assess the likely environmental impacts. The proposal involves considerable seabed preparation and installation activities within a dynamic Atlantic environment, yet it does not include comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be developed after consent, which obstructs any meaningful assessment of their effectiveness or adequacy.

This dependence on unspecified future measures raises alarms given the delicate nature of the surrounding environment. The West Lewis coastline is home to pristine coastal waters and crucial habitats that are at risk from sediment disruption and contamination. While the application acknowledges potential hazards, including sediment mobilisation and accidental spills of chemicals or oil, it lacks sufficient detail on how such incidents will be prevented, managed, or monitored.

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

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a stage after consent, the application undermines the ability to evaluate whether adequate safeguards exist to address pollution events. This creates procedural risks and diminishes the capacity of the competent authority to properly assess environmental protection measures during the decision-making process.

From a regulatory standpoint, the postponement of critical environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is imperative that significant effects and mitigation strategies are evaluated prior to

consent; without this information, a lawful determination cannot be reached. Additionally, the application fails to illustrate adherence to policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal's assessment of marine life and fisheries is fundamentally inadequate, failing to provide a thorough examination of both ecological and socio-economic implications. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry, yet the application does not adequately ensure that these vital habitats and activities will remain protected and maintained without considerable disruption.

A notable concern is the unsubstantiated assumption that fishing activities can be displaced without repercussions. There is a lack of evidence indicating that alternative fishing grounds are available, accessible, or able to accommodate any increased pressure from displaced fishing. This absence of information is critical, as such displacement could lead to overfishing in other areas and may result in broader economic ramifications for the local fishing fleet. Without a detailed and evidence-based evaluation, the implications for fisheries and local livelihoods are not fully understood.

Moreover, the proposal poses significant threats to marine species, particularly due to the underwater noise generated during construction activities. The use of high-energy hammer piling over an extended period is anticipated to cause disturbance across considerable distances, impacting species including dolphins. The forecasted disturbance to a substantial portion of the local bottlenose dolphin population raises alarming concerns, yet the application minimizes the importance of these effects without adequate supporting evidence.

Inconsistencies within the application are evident, as it acknowledges the necessity for licenses to permit harm to European Protected Species while simultaneously characterising impacts as negligible. This contradiction diminishes the credibility of the assessment and raises alarms regarding adherence to the Habitats Regulations, especially when harm is expected to an extent that warrants legal authorization.

The assessment also neglects to account for cumulative impacts stemming from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough assessment of these interconnected effects, the overall impact on marine ecosystems and socio-economic conditions remains undetermined.

From a policy standpoint, the application does not illustrate conformity with the National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with current marine users or evade unacceptable impacts on marine biodiversity, making it impossible to conclude that the proposal is sustainable.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application for the project is fundamentally flawed due to the incomplete assessment of onshore infrastructure, which neglects to acknowledge the full scope of impacts associated with what constitutes a single integrated project. The offshore turbines and the onshore works are intrinsically connected, yet they have been evaluated separately. This disjointed approach obscures the true magnitude of environmental and socio-economic consequences.

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

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

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

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

From a policy standpoint, the failure to assess the project comprehensively and to

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks an evaluation of dark skies and nocturnal wildlife, representing a significant oversight. The West Lewis coastline is renowned for its exceptionally dark skies, which play a vital role in enhancing environmental quality, cultural identity, and tourism appeal. The proposed installation of permanent red aviation lighting, which would be visible over long distances, is set to create an intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

Moreover, the application fails to assess the implications of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly crucial given the value of dark skies to the identity of the area and its emerging tourism sectors, such as astro-tourism. The lack of consideration for these impacts indicates a significant deficiency in the overall landscape and environmental assessment.

Equally concerning is the absence of an evaluation regarding the effects 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 lead to disorientation and an increased risk of collisions. The proposal does not include any form of lighting impact assessment or phototaxis study, thus neglecting to evaluate how the aviation lighting might impact these species or contribute to increased mortality rates.

This deficiency is further aggravated by the dependence on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and its associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this danger has not been assessed. The lack of site-specific night-time data creates a critical void in understanding ecological impacts.

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

From a policy standpoint, the omission contravenes the National Planning Framework 4 regarding the safeguarding of natural environments and the maintenance of environmental quality. Furthermore, it undermines the wider analysis of landscape and seascape impacts, as the character of night-time is an integral component of the environment.

In summary, the failure to assess dark skies and nocturnal wildlife represents a considerable 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 application under consideration presents a significant deficiency in its assessment of tourism impacts, neglecting to evaluate both the economic and social ramifications for a vital sector of the Isle of Lewis economy. The economy of the island is heavily reliant on its wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. While it is noted that 86% of visitors are attracted by the scenery, the application fails to provide any quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contribution of tourism.

Tourism on the Isle of Lewis has experienced noteworthy growth, rising from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs, accounting for up to 16% of the island's economy. However, there is no modelling of how the industrialisation of the seascape and the resulting decline in environmental quality would affect Tourism Gross Value Added or broader economic resilience. Without such an analysis, it remains unclear whether the proposed development would bring about a net economic benefit or harm an already established and expanding sector.

Another critical aspect overlooked in the assessment is the importance of environmental quality in sustaining tourism, particularly how unspoiled landscapes and dark skies enhance visitor experiences and cater to emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment only exacerbates this issue, resulting in a substantial gap in understanding the potential effects on a recognised and thriving part of the local economy.

In an island community characterised by limited economic diversification, the failure to evaluate the impacts on tourism has broader implications, affecting employment, local businesses, and overall community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly addressed, contrary to the requirements set out in the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly concerning economic impact and the obligation to

illustrate a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and does not furnish adequate evidence for the competent authority to assess the economic implications of the proposal.

Overall, the failure to quantify tourism impacts, evaluate the environmental factors influencing visitor behaviour, and consider the economic dependency of the island culminates in a significant evidential gap. This gap hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm stands as a clear failure to meet the standards of sustainable development, as established by statutory obligations, national policy, and evidential criteria. It mirrors the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. Despite being submitted under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

A complete and reliable evidential basis for determining this application is lacking. There are significant gaps in baseline data, and the use of an undefined design envelope raises concerns. Additionally, the application relies on unspecified mitigation measures and fails to address critical impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete, hindering a full understanding of likely significant effects and residual impacts.

Procedural failures are also evident in this application. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the full Social Impact Assessment constitutes a material omission. These shortcomings inhibit the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In addition, the proposal is in direct opposition to National Planning Framework 4, as it does not adequately protect biodiversity, natural environments, and cultural heritage. It has not demonstrated that health and wellbeing impacts are acceptable, nor can it prove a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately assessed, leading to obscured impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit inconsistencies. The evidential threshold required to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and precluding a lawful conclusion that impacts are

acceptable.

This proposal would also 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 adverse effects on tourism represent permanent changes that cannot be adequately mitigated.

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

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

Additional Comments

There's absolutely nothing clean or green about wind farms. The longer I live & the more I find out about them, the worse I find them to be. They cause illness in people and animals, they kill birds & bats, they even drive the worms out of the ground. There's nothing at all good about wind farms. Not a single conventional power station has been closed down since the UK has been constructing wind farms. The power they produce is intermittent. Unreliable. The huge battery banks now being planned & built just add yet another layer of desecration to this 'green' nonsense.

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: 14114D81

Member of the public 945

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is incomplete and lacks a full, transparent, and reliable depiction of the anticipated environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty and obstructs the application of a worst-case scenario. This compromises the integrity of the assessment, rendering the impacts presented potentially inconsistent with the actual development, thus hindering both public understanding and the competent authority's comprehension of the true environmental repercussions.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives in this application is materially inadequate and does not fulfil the statutory requirements of the Environmental Impact Assessment regime. Instead of delivering a structured and reasoned comparison of realistic alternatives based on environmental effects, the submission offers a narrative account detailing the project's evolution. This methodology fails to illustrate that less harmful options have been properly identified, assessed, and chosen 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 provide evidence that the developer has seriously considered positioning turbines further offshore, where visual, ecological, and coastal impacts would likely be lessened. Considering the sensitivity of the West Lewis coastline and the crucial role of proximity to shore in assessing impact, the absence of this analysis hinders any conclusion that the proposed siting is the least damaging option.

These deficiencies also extend to the assessment of cable routing and landfall, with insufficient evidence demonstrating that alternative routes have been thoroughly explored to avoid or mitigate impacts on sensitive receptors. This includes 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, relying instead on post-design measures.

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

From a policy standpoint, this shortcoming undermines 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 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 presents a serious shortcoming in its assessment of marine ecology and protected species within the West Lewis coastal environment. This area is a highly sensitive and biologically active marine system; however, the baseline data provided is incomplete, and the methodologies used fail to adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment does not offer a reliable evidential basis for evaluating potential impacts.

A critical gap in the assessment pertains to otters, which are recognised as a European Protected Species. The application does not sufficiently acknowledge or assess their

active use of coastal areas for foraging and movement. Due to the oversight of their core foraging range and behavioural patterns, the assessment does not adequately evaluate the potential effects of construction disturbance, noise, and increased activity, thereby undermining conclusions related to the absence of significant effects on this species.

Further issues are evident in the assessment of basking sharks. The reliance on aerial surveys results in significant detection bias, particularly in the challenging Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially in light of established land-based observations indicating their frequent use of these waters. The failure to incorporate or appropriately consider such data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws lead to conclusions of negligible or non-significant effects that are based more on assumptions than on robust evidence. The lack of adequate baseline data further hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the actual scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as the assessment of protected species is insufficient. The uncertainty introduced prevents the clear exclusion of adverse effects beyond reasonable scientific doubt, necessitating the invocation of 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 deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, ultimately leading to the conclusion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a significant concern regarding its ability to meet the evidential threshold necessary for concluding that there will be no adverse effect on the integrity of protected sites. The ornithological assessment contains considerable gaps in evidence, coupled with internal contradictions that undermine its reliability. Notably, the assessment fails to robustly evaluate the implications associated with displacement, collision risk, and habitat loss for seabird populations in key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which is known to support internationally important seabird species, many of which are already in decline.

A critical inconsistency is evident in the application, where the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats

Regulations derogation case, which is only necessitated when significant harm is anticipated. This contradiction raises serious doubts regarding the validity of the assessment and highlights that the conclusions drawn are not underpinned by sufficient evidence.

Furthermore, the assessment does not adequately demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It fails to fully account for the importance of these feeding grounds, and its reliance on modelling approaches introduces an element of uncertainty, particularly for declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially in light of incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor presents an additional risk, as it effectively creates a barrier within a primary flight path for species migrating between the United Kingdom and Iceland. The application neglects to adequately assess the long-term consequences of sustained mortality in this corridor and the potential ramifications for species with relatively small global populations.

The cumulative effect of these deficiencies signifies a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected places this proposal in direct opposition to national policy.

Overall, the assessment is marred by methodological weaknesses, insufficient evidence, and internal inconsistency, which collectively hinder a robust evaluation of impacts. These shortcomings lead to the conclusion that the application does not satisfy the statutory requirements necessary for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity associated with the proposed development is grossly inadequate. It overlooks the West Lewis coastline as a vibrant cultural landscape, where the environment, language, tradition, and community are intertwined. The approach taken in the application reduces heritage to mere static assets, failing to acknowledge their ongoing social, cultural, and spiritual significance.

A notable shortcoming is the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites remain active burial grounds and places of spiritual practice, yet they are mischaracterised as static features. This perspective disregards their continued use and meaning, leading to an incomplete assessment of the cultural effects and neglecting their importance to community life.

Additionally, the assessment does not address intangible cultural heritage, which includes the Gaelic language, local traditions, and the longstanding relationship the

community maintains with the coastal environment. These elements are vital to the area's identity and are notably absent from the evaluation, representing a significant oversight. Without recognising these factors, it is impossible to fully comprehend the cultural impact of the development.

Concerns also arise regarding the rights of the community and their engagement in the process. The Gaelic-speaking population has a unique cultural identity, characterised as an Indigenous People; however, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to adhere to established principles regarding participation in decisions that affect cultural and environmental interests.

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

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

In summary, the shortcomings in assessing living heritage, intangible cultural value, community rights, and compliance with statutory obligations create a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not furnish a sound basis for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report has not been published. This lack of transparency results in a significant evidential gap, hindering both public understanding and the competent authority's ability to assess the social risks identified through the developer's own research. Available summaries highlight that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These reported impacts stem from direct engagement, indicating that they are based on lived experiences rather than speculation. Yet, without access to the complete assessment, proper scrutiny of these findings is not possible, limiting the ability to gauge their significance in the decision-making process.

There is also documented evidence suggesting that the proposal poses a direct threat to community identity and cohesion, with findings of "cultural loss" emerging from the developer's own research. Nonetheless, these concerns have not been adequately integrated into the main application or given appropriate consideration. The withholding

of the full Social Impact Assessment obscures the true human and social costs associated with the development, which further undermines the Environmental Impact Assessment process.

A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly when the character and functioning of the community may be at risk. The application does not provide the full dataset needed to accurately assess the balance between benefits and harm, failing to meet the evidential standards required.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development should foster positive health outcomes and mitigate harm; however, existing evidence points to adverse effects that have not been disclosed in full. Without access to the entire assessment, compliance with this policy cannot be substantiated.

The procedural ramifications of this situation are significant. The competent authority is unable to carry out a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This represents a material omission within the application and signifies a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, alongside evidence of existing adverse effects, leads to an incomplete and unreliable assessment. This situation obstructs a lawful determination, reinforcing the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The 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 related to the proposed turbines is materially deficient, failing to adequately reflect the scale of change and the sensitivity of the receiving environment. The introduction of large-scale turbines in close proximity to the shoreline would create a continuous industrial presence, fundamentally altering this character and leading to a permanent transformation of the landscape.

The application does not sufficiently represent the magnitude of visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and widely used coastal locations, directly impacting visual amenity and undermining the defining qualities of naturalness and remoteness. This level of impact and its significance within such a sensitive landscape have not been properly conveyed in the assessment.

Moreover, there are methodological concerns regarding the selection and presentation of visual viewpoints. Evidence suggests that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning

key cultural heritage sites and high-value landscapes. Such shortcomings risk understating the magnitude of visual impact, thus undermining the reliability of the assessment.

The assessment also neglects to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, like the Calanais Standing Stones and other Scheduled Monuments, are integral to a wider landscape setting connected by visual and spatial relationships to the Atlantic horizon. Treating these assets in isolation fails to acknowledge their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these vital connections, altering the context in which heritage assets are experienced and disrupting their relationship with the natural horizon. This represents not only a visual impact but a broader cultural and spatial harm that has not been adequately assessed in the application.

From a policy perspective, the proposal is at odds with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The scale of change is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further undermines any claim of compliance with policy.

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. The resulting change is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation.

In conclusion, 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 proposed development presents significant deficiencies in the assessment of construction and pollution risks, which are insufficient for evaluating potential environmental effects. The project entails extensive seabed preparation and installation activities in a high-energy Atlantic environment. However, there are no fully articulated Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application defers mitigation and contingency measures to a post-consent phase, which impedes any substantial assessment of their adequacy or effectiveness.

This approach is particularly troubling 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 both sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the

possibility of accidental chemical or oil spills, it fails to offer adequate detail on preventative, control, or monitoring strategies.

Moreover, there is considerable uncertainty regarding the scale and behaviour of sediment plumes generated from seabed disruption and cable installation. In the absence of robust modelling and explicit management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these effects. This uncertainty also extends to potential impacts on marine species and habitats already recognised as sensitive within the broader assessment.

The lack of comprehensive emergency response procedures only exacerbates these issues. By postponing contingency planning until after consent is granted, the application obstructs the evaluation of whether sufficient safeguards are in place to address pollution incidents. This creates procedural risk and diminishes the capacity of the competent authority to assess environmental protection measures at the decision-making stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. An assessment of likely significant effects and their corresponding mitigation must occur prior to consent; where such information is lacking, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially inadequate. These shortcomings hinder a thorough evaluation of construction and pollution risks and further reinforce the assertion that the application remains incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry. However, the application lacks a thorough assessment of the ecological and socio-economic impacts on these resources. It fails to show how these uses and habitats can be maintained without causing significant disruption.

A major concern is the assumption that fishing activity can be moved without consequences. There is no evidence provided that alternative fishing grounds are available or can sustain the additional pressure. This is a crucial oversight, as displacement could lead to overfishing in other areas and might have wider economic repercussions for the local fishing fleet. Without a proper, evidence-based evaluation, the effects on fisheries and livelihoods are not fully understood.

Additionally, the proposal poses serious risks to marine species due to underwater noise during construction. The use of high-energy hammer piling for extended periods could disturb marine life over large distances, particularly affecting species like

dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is concerning, yet the application minimises these impacts without adequate supporting evidence.

The application inconsistently acknowledges the need for licences to allow harm to European Protected Species, while simultaneously claiming that impacts are negligible. This contradiction undermines the assessment's credibility and raises concerns about compliance with the Habitats Regulations, particularly where anticipated harm requires legal authorisation.

Moreover, the assessment does not address the cumulative impacts of multiple stressors, such as habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains unclear.

From a policy standpoint, the application does not comply with National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity. This lack of compliance prevents a 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 make the assessment incomplete and unreliable. These shortcomings hinder a comprehensive evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents an incomplete assessment of the onshore infrastructure, overlooking the comprehensive impacts that arise from this interconnected project. The offshore turbines and onshore works are inherently related, yet they have been evaluated separately, leading to a disjointed approach that obscures the true extent of environmental and socio-economic implications.

Significantly, the onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, recognised as a crucial carbon store and ecologically sensitive habitat. The application fails to deliver a thorough evaluation of these impacts, which hampers a full understanding of the project's overall environmental footprint.

By excluding or postponing the assessment of onshore impacts, the application inhibits a proper appraisal of cumulative effects. The Environmental Impact Assessment process stipulates that all parts of a project must be reviewed collectively; however, the division between offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain inadequately understood.

Moreover, there are considerable risks posed to sensitive habitats, including machair systems and peatland environments, which enjoy policy protection. The application does not sufficiently demonstrate that impacts on these habitats have been comprehensively assessed or that suitable avoidance measures have been put in place, resulting in a significant evidential gap concerning biodiversity protection.

The proposal also raises critical concerns regarding carbon balance. The disturbance of peatland can lead to the release of stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy initiatives. The application inadequately addresses this matter or shows that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land may lead to conflicts with current land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, casting doubt on the feasibility and lawful execution of the project.

From a policy standpoint, the failure to consider the project as a whole and to demonstrate the protection of peatlands, habitats, and land use interests runs counter to the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further detracts from the application's validity.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment does not include an assessment of dark skies and nocturnal wildlife, which is a significant omission. The West Lewis coastline is known for its exceptionally dark skies, which contribute to environmental quality, cultural identity, and tourism. The proposal introduces permanent red aviation lighting that will be visible from long distances, creating a continuous and intrusive "wall of light" effect across the western horizon. This will fundamentally change the night-time environment.

There is no evaluation of the lighting's impact on visual amenity, landscape character, or the experiences of residents and visitors. This is particularly important because dark skies are crucial to the area's identity and are becoming increasingly relevant to tourism sectors like astro-tourism. The lack of consideration for these impacts represents a clear gap in the environmental and landscape assessment.

Moreover, the application fails to assess the effects of lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially sensitive to artificial lighting, which can lead to disorientation and a

higher risk of collision. The absence of a lighting impact assessment or a phototaxis study means that the potential effects of aviation lighting on these species and the risk of increased mortality remain unexamined.

The reliance on daytime survey data within the ornithological assessment is a further issue, as it does not account for nocturnal activity or associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, but this has not been evaluated. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts.

Without assessing nocturnal effects, it is impossible to determine if protected species or designated sites will be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be achieved. This engages the precautionary principle and hinders a lawful determination.

From a policy perspective, the absence of this assessment conflicts with National Planning Framework 4 regarding the protection of natural places and environmental quality. It also affects the overall evaluation of landscape and seascape impacts, as the night-time character is a vital aspect of the environment.

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

TOURISM

The tourism sector of the Isle of Lewis has experienced substantial growth, with its economic contribution rising from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and constituting up to 16% of the island's economy. However, the current application lacks a thorough assessment of how proposed large-scale offshore infrastructure could impact visitor numbers, behaviours, and the overall economic contribution of tourism, despite acknowledging that 86% of visitors are attracted by the area's scenic beauty. This absence of a quantified analysis raises significant concerns regarding whether the development may yield a net economic benefit or potentially undermine a crucial and expanding sector.

Furthermore, the assessment inadequately addresses the vital relationship between environmental quality and tourism, neglecting to evaluate how the preservation of unspoiled landscapes and dark skies enhances the visitor experience. The lack of a Dark Skies Assessment exacerbates this oversight, highlighting a substantial gap in understanding the implications for emerging markets such as nature-based tourism and astro-tourism.

The implications of not assessing tourism impacts extend beyond the sector itself, affecting local employment, businesses, and the sustainability of the community, particularly within an island context that exhibits limited economic diversification. The

omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities, as mandated under the Islands (Scotland) Act 2018, have not been properly evaluated. From a policy standpoint, the application fails to adhere to the principles outlined in the National Planning Framework 4, especially concerning the necessity of demonstrating a net benefit and aligning with strategic objectives that prioritise tourism as a growth sector. This inadequacy further hampers the competent authority's ability to thoroughly assess the economic consequences of the proposal.

In conclusion, the deficiencies in quantifying tourism impacts, evaluating the environmental factors that drive visitor behaviour, and recognising the island's economic dependency culminate in a significant evidential gap. This gap hinders a comprehensive evaluation of the economic effects and suggests that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm demonstrates significant shortcomings regarding sustainable development, as assessed against statutory obligations, national policies, and evidential standards. This proposal mirrors the issues that resulted in the refusal of the Lewis Wind Power application in 2008, when the scale of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it fails to address these crucial aspects adequately.

There are substantial gaps in the evidential basis required for a thorough determination of the application. Key areas such as baseline data, the ambiguous design envelope, unspecified mitigation measures, and the exclusion of critical impact pathways—including nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects—are notably lacking. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of the likely significant effects and residual impacts associated with the proposal.

Additionally, procedural deficiencies are evident. The omission of a compliant Island Communities Impact Assessment violates statutory duties under the Islands (Scotland) Act 2018, while the failure to provide a complete Social Impact Assessment is a significant oversight. These inadequacies obstruct the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

In direct violation of National Planning Framework 4, the proposal fails to demonstrate adequate protection for biodiversity, natural spaces, and cultural heritage. There is no evidence that health and wellbeing impacts are acceptable, nor is there a demonstrated net economic benefit due to the lack of tourism impact modelling. The cumulative impacts from both offshore and onshore components have not been sufficiently evaluated, clouding the understanding of effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks persist and may be significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The evidential threshold needed to eliminate adverse effects beyond reasonable scientific doubt remains unmet, thereby activating the precautionary principle and preventing a lawful conclusion regarding the acceptability of the impacts.

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

When considering all these factors, the application proves to be procedurally and substantively unfit for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks obstructs a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuse consent on these grounds or invoke the appropriate regulatory provisions to compel the submission of the necessary missing information.

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

Additional Comments

I moved to Scotland 37 years ago. It is my home, my land ever since. I have wandered over land & coast. More important this precious, rare human life, all life, depends on this precious land. Each is interdependent on the other & as we can observe from 250 years of industrial desecration, we only know the impact in years to come because we rush to unwise choices & decisions. Generations long after you & I are gone will wonder & ask " for gods,sake why!?" Please just stop & ask, does this really make sense, is it really the wise thing to do?

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: 7DFD290B

Member of the public 946

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under marine licensing and Environmental Impact Assessment requirements. It is founded on a review of the Environmental Impact Assessment Report and related documents, highlighting significant deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. The scale and design of the proposal, along with its proximity to the shore, raises serious concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. There are critical gaps in environmental data, with baseline information being both limited and inconsistent, and several key elements of the proposal remain undefined. The flexible design framework obstructs a clear assessment of likely significant effects, while the reliance on unspecified mitigation measures leaves their effectiveness unassessed. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust supporting evidence.

Furthermore, there are evident and substantial policy conflicts associated with the proposal. It appears at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The proposal does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests necessary for consent and hinder the competent authority's ability to ascertain the development's acceptability from a policy standpoint.

The unprecedented scale of this proposal raises further concerns, with large turbines positioned near the shoreline, raising issues related to landscape capacity, visual dominance, and environmental impact. In light of the lack of adequate information, dependence on undefined mitigation, evidential shortcomings, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. In this context, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary depth and transparency, providing an incomplete overview of the potential environmental consequences of the proposal. The flexible Project Design Envelope, which does not commit to fixed turbine dimensions, layouts, or configurations, creates considerable uncertainty. This variability hampers the ability to apply a worst-case scenario consistently, thus undermining the assessment's integrity. As a result, the impacts detailed may not accurately represent the development as it will be constructed, making it difficult for both the public and the competent authority to grasp the actual environmental implications.

Moreover, the application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that environmental harm will be addressed later inhibits a thorough evaluation of the proposed measures' effectiveness and obscures the assessment of residual impacts. This postponement of essential information until after consent is granted is procedurally unacceptable and contradicts the fundamental objectives of the Environmental Impact Assessment regime, which mandates that significant effects and their mitigation must be clearly delineated before any determination.

There are also critical evidential shortcomings, including insufficient baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. These gaps generate uncertainty concerning the magnitude and significance of impacts, especially when negligible or non-significant effects are claimed without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that contradicts statutory obligations.

Consequently, the application does not fulfil the evidential criteria stipulated under the Habitats Regulations, which are necessary to dismiss adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, including the stipulations related to biodiversity protection and environmental integrity, as it fails to provide evidence that impacts have been thoroughly assessed or that adequate safeguards are established.

In summary, the reliance on an undefined design envelope, the absence of concrete mitigation strategies, and the significant 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 make an informed decision based on the information currently available.

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 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 proposed development raises significant concerns regarding its impact on the ornithological environment, particularly given that it is situated within key foraging areas and migratory pathways for seabirds. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. However, the application fails to provide adequate evidence that these species will not be adversely affected. The assessment lacks a thorough evaluation of the implications of displacement, collision risk, and habitat loss, which are critical factors in understanding the potential impacts on these birds.

There are fundamental contradictions present in the application itself, as the developer asserts no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is typically warranted only where significant harm

is anticipated. This inconsistency raises questions about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the necessary evidence. Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not fully acknowledged, and the modelling approaches employed create uncertainties, particularly for species in severe decline such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, particularly given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Moreover, the placement of turbines within a recognised migratory corridor poses an additional and significant risk, creating a barrier within a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not adequately examine the long-term ramifications 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 satisfy the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, coupled with gaps in data and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and precludes a lawful conclusion that could support consent.

Overall, the identified deficiencies represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy. Collectively, these factors render the assessment unreliable due to internal inconsistencies, methodological flaws, and a lack of sufficient evidence. These shortcomings hinder a comprehensive evaluation of impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity within the application is profoundly lacking. It does not recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community intertwine. Instead, the application simplifies heritage into a collection of isolated, static assets, overlooking their ongoing social, cultural, and spiritual roles within the community.

Notably, the assessment inadequately addresses the significance of sites such as the cemeteries at Dalmore, Bragar, and Barvas, which are active burial and spiritual locations. The categorisation of these sites as mere static features fails to consider their continued use and the implications of development on their surroundings. This oversight leads to an incomplete understanding of cultural effects and neglects their integral position in community life.

Moreover, the application disregards intangible cultural heritage, including the Gaelic language and traditions, alongside the community's deep-rooted connection to the coastal environment. These elements are vital to the area's identity yet are conspicuously absent from the assessment, representing a considerable shortcoming. Without acknowledging these aspects, the cultural ramifications of the proposed development remain inadequately understood.

There are additional issues 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 granted the process of Free, Prior and Informed Consent. This lack of genuine engagement calls into question the legitimacy of the assessment and contradicts established principles regarding participation in matters affecting cultural and environmental concerns.

Furthermore, a significant procedural error exists in the failure to complete a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment inhibits the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic effects on the island community. This alone renders the determination of the proposal unlawful.

From a policy perspective, these inadequacies position the proposal in direct conflict with National Planning Framework 4, particularly concerning the safeguarding of historic assets and locations. The neglect of both tangible and intangible heritage, as well as living cultural practices, clearly deviates from the necessary policy directives.

In conclusion, the cumulative failure to assess living heritage, intangible cultural value, community rights, and to adhere to statutory requirements creates a significant evidential void. The cultural impacts of the development have not been sufficiently evaluated, and the application lacks a robust foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is critical and has severe implications for the evaluation process. The developer has commissioned a Social Impact Assessment that included focus groups with local residents, yet the full report remains unpublished. This failure to disclose vital information creates a significant evidential gap, preventing both the public and the competent authority from understanding the complete range of social risks highlighted by the developer's own research.

Available summaries show that residents are already facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are grounded in direct engagement and are not based on speculation. However, the lack of access to the full assessment hinders proper scrutiny of these

findings, limiting the capacity to assess their importance in the decision-making process.

Moreover, evidence indicates that the proposal is viewed as a direct threat to community identity and cohesion, with findings pointing to a potential "cultural loss." Yet, these impacts have not been adequately incorporated into the primary application nor given the necessary consideration. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This absence of transparency severely undermines the Environmental Impact Assessment process. It is crucial to have a complete understanding of the social, economic, and health implications for developments of this magnitude, especially when community character and function may be at stake. Without the full dataset, the application does not provide a comprehensive evidential basis for weighing the benefits against the potential harm.

From a policy standpoint, the application is unable to demonstrate its compliance with National Planning Framework 4 concerning health and wellbeing. Developments must contribute to positive health outcomes and mitigate harm, yet the evidence currently available suggests existing adverse effects that remain undisclosed. In light of the absence of the complete assessment, compliance with this policy is unprovable.

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

In summary, the combination of the non-disclosure of the full Social Impact Assessment and evidence of current adverse impacts renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the view that the application lacks adequate supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented regarding the seascape, landscape, and visual impacts is significantly lacking, failing to adequately reflect both the extent of change and the sensitivity of the environment in question. The West Lewis coastline is characterised by its unspoilt open Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. Should large-scale turbines be introduced near the shoreline, they would establish a continuous and overpowering industrial presence, fundamentally changing this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the application does not sufficiently convey the scale of visual changes that would occur. The size and close proximity of the turbines are such that they would overshadow views from residential areas, historic sites, and popular coastal locations.

This situation would directly impact visual amenity, diminishing the intrinsic qualities of naturalness and remoteness that define the area. The assessment does not adequately express the severity of this impact or its significance within the context of such a sensitive landscape.

Methodological issues also arise concerning the selection and presentation of visual viewpoints. Evidence suggests that the chosen viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, particularly regarding key cultural heritage sites and landscapes of high value. This oversight raises the possibility that the magnitude of visual impact has been minimised, thereby undermining the reliability of the assessment process.

Another critical gap is the lack of evaluation of the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these cultural assets as isolated rather than recognising their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

The potential industrialisation of the seascape threatens to sever these important relationships, altering how heritage assets are experienced and disrupting their ties to the natural horizon. This scenario presents not merely a visual impact but a wider cultural and spatial harm that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly in its aim to protect natural places and historic assets. The magnitude of change proposed is at odds with the imperative to safeguard landscape character, visual amenity, and the context of culturally significant sites. The lack of a thorough 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 both dominant and unavoidable. Consequently, the resulting changes would be fundamental and permanent, incapable of being reduced to an acceptable level through mitigation measures.

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 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 regarding construction and pollution risks is fundamentally lacking, failing to provide the necessary detail to evaluate the potential environmental impacts adequately. The proposal entails significant seabed preparation and installation works within a high-energy Atlantic environment. However, there are no comprehensive

Construction Environmental Management Plans or Pollution Prevention Plans available. Instead, the application depends on mitigation and contingency measures that would only be developed after consent, which precludes any thorough evaluation of their effectiveness or adequacy.

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

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

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

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

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and a thriving fishing industry. However, the assessment of fisheries and marine life within the application is inadequate and lacks a thorough evaluation of both ecological and socio-economic impacts. It fails to demonstrate that these critical uses and habitats can be safeguarded without substantial disruption.

One major concern is the assumption that fishing activities can be displaced without

repercussions. The application does not provide any evidence indicating that there are alternative fishing grounds that are accessible and able to bear the additional pressure. This gap in information is crucial, as the potential for displacement risks overfishing in other areas, which could lead to broader economic ramifications for the local fishing fleet. Without a solid, evidence-based assessment, the repercussions for fisheries and local livelihoods remain unclear.

Furthermore, the proposal presents significant risks to marine species, particularly due to underwater noise created during construction activities. The use of high-energy hammer piling over an extended duration is expected to disturb marine life across considerable distances, notably affecting species such as dolphins. The predicted impact on a significant portion of the local bottlenose dolphin population is alarming; nonetheless, the application minimizes the importance of these effects without adequate evidence to support such claims.

There is a clear contradiction within the application regarding the requirement for licences to permit harm to European Protected Species, while simultaneously categorising impacts as negligible. This inconsistency undermines the assessment's credibility and raises concerns about adherence to the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Additionally, the assessment neglects to address the cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. 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 falls short of demonstrating compliance with the National Planning Framework 4 or the National Marine Plan. It does not adequately show that the proposed development can coexist with current marine users or that it can avoid unacceptable impacts on marine biodiversity. This lack of clarity prevents any conclusion that the proposal is sustainable.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents a range of significant risks and gaps that undermine its reliability and legality. The routing of infrastructure through active croft land raises concerns over potential conflicts with existing land use and legal rights. There is insufficient evidence provided to demonstrate that the necessary consents or processes have been initiated, which calls into question the deliverability and lawful implementation of the project.

The proposal also fails to adequately address the critical issue of carbon balance. Disturbances to peatland release stored carbon, leading to a carbon debt that could contradict the aims of renewable energy development. Without demonstrating that the overall carbon balance remains beneficial, the application lacks a crucial component necessary for a proper assessment.

Moreover, there are serious implications for sensitive habitats such as machair systems and peatland environments that are afforded policy protection. The application does not show that these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, indicating a clear evidential gap regarding biodiversity protection.

The assessment of onshore infrastructure is fundamentally flawed and incomplete, failing to consider the interconnected nature of the offshore turbines and onshore works. This fragmented approach obscures the true scale of environmental and socio-economic effects that arise from what is a single integrated project. The onshore components, including cabling across protected moorland and the construction of a substation near Stornoway, involve excavation in areas of deep peat, particularly within Barvas Moor, which is a significant carbon store and ecologically sensitive habitat. The lack of a comprehensive assessment of these impacts hinders a full understanding of the project's overall environmental footprint.

Additionally, the separation of offshore and onshore elements prevents the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project are considered together. However, by treating them separately, the combined impacts on peatlands, habitats, and communities remain inadequately understood.

From a policy standpoint, the failure to evaluate the project as a whole and demonstrate protection for peatlands, habitats, and land use interests is in conflict with the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further diminishes the application's validity. Collectively, these factors render this part of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

The application does not evaluate how this lighting might affect visual amenity, landscape character, or the experiences of both residents and visitors. This is

particularly concerning given the importance of dark skies for the area's identity and the growing tourism sector focused on astro-tourism. The lack of consideration for these impacts reveals a significant gap in the environmental and landscape assessment.

Moreover, there is no analysis of the effects on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially vulnerable to artificial lighting due to their phototactic behaviour, which can lead to disorientation and a heightened risk of collision. The application does not present a lighting impact assessment or a phototaxis study, failing to address how aviation lighting may impact these species or contribute to increased mortality rates.

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

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

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

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

TOURISM

The assessment of tourism impacts related to the proposed development is significantly lacking and does not adequately evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application acknowledges that 86% of visitors are attracted by scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure would impact visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism on the Isle of Lewis has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and accounting for

as much as 16% of the island's economy. Nevertheless, the application neglects to model how the industrialisation of the seascape and the potential loss of environmental quality would affect Tourism Gross Value Added or the wider economic resilience of the area. Without this crucial analysis, it remains unclear whether the proposed development would result in a net economic benefit or jeopardise a crucial and expanding sector.

Moreover, the assessment fails to acknowledge the significance of environmental quality in underpinning tourism, including the critical role that unspoiled landscapes and dark skies play in shaping visitor experiences and the growth of niche markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a notable gap in understanding the impacts on a recognised and burgeoning segment of the local economy.

Given that the island community has limited economic diversification, the inadequate assessment of tourism impacts carries broader implications for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated in accordance with the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly regarding economic impact and the necessity to establish a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and fails to supply adequate evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and recognise the economic dependence of the island culminates in a substantial evidential gap. This deficiency hampers a thorough evaluation of the economic effects and underscores the conclusion that the application is incomplete.

SUMMARY

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

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

effects or residual impacts.

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

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

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

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

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

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

Additional Comments

I am beyond distressed by this proposed development, which is in addition to the hundreds of other destructive so called green energy initiatives all over our once beautiful country.

We have more than enough wind farms to meet our needs, at the cost of land and seascapes once the envy of the world

Research is showing the obvious negative impact on sea life and birds of offshore turbines if which there are already too many. There is no need for this one either

On land we are told to use peat free compost and support restoration of our peatlands while thousands of tons are dug up to make room for massive concrete bases for turbines - concrete that will be there for ever

We are encouraged to buy local produce while the land is covered in solar panels.

We are living through a dangerous era with Russia eyeing our undersea cables and recruiting Bulgarian saboteurs who could easily target BESS lithium parks which are now scattered all over the country.

Saving 0.05% of planetary co2 is not going to make an iota of difference to climate change. The sacrifice is out of all proportion.

Please join the dots!

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: B742E18E

Member of the public 947

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and its accompanying documents, highlighting significant deficiencies in planning, environmental, cultural, and procedural aspects. The development is proposed to be located off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns regarding its compatibility with statutory requirements, national policy, and the principles of sustainable development are deeply rooted in the scale, proximity, and design of the proposal.

The application is lacking a sufficient evidential foundation for a lawful determination. Key environmental data is absent, the baseline information provided is both limited and inconsistent, and critical elements of the proposal remain undefined. The reliance on a flexible design framework obscures the understanding of potential significant effects, while the dependence on unspecified mitigation measures renders their effectiveness unverifiable. Consequently, the documentation fails to facilitate a complete and informed understanding of the impacts on the environment, culture, or community, with assertions of negligible or non-significant effects lacking robust evidence.

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

The unprecedented scale of this proposal raises significant concerns, particularly regarding the positioning of large turbines in close proximity to the shoreline, which could adversely affect landscape capacity, visual dominance, and the environment. In light of the insufficient information provided, the reliance on undefined mitigation, evidential weaknesses, and evident policy non-compliance, it is clear that the application is incomplete and cannot sustain a lawful determination. Given these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents several critical deficiencies that raise concerns about its reliability and transparency regarding the environmental effects of the proposed development. A significant issue is the adoption of a flexible Project Design Envelope, which lacks specific details about turbine dimensions, layouts, or configurations. This ambiguity introduces substantial uncertainty and hinders the ability to apply a worst-case scenario consistently. Consequently, the reported impacts may not accurately reflect the actual development, leaving both the public and the competent authority unable to fully comprehend the environmental implications.

Moreover, the application is heavily reliant on mitigation measures, monitoring strategies, and management plans that are yet to be established. Seeking consent on the premise that environmental harm will be addressed in the future diminishes the opportunity for a meaningful evaluation of the effectiveness of these measures and the assessment of any residual impacts. This postponement of crucial information until post-consent stages is procedurally unacceptable and undermines the intent of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies must be clearly delineated before determination.

Additionally, there are significant gaps in the evidence presented, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainties surrounding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are asserted without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainties that conflict with statutory requirements.

As a result, the application does not meet the evidential standards necessary under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes obligations pertaining to biodiversity protection and environmental integrity, as it remains unproven that impacts have been thoroughly assessed or that adequate safeguards are in place.

In summary, the combination of an undefined design envelope, unspecified mitigation measures, and significant gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings impede a lawful and thorough evaluation of environmental effects, leaving the competent authority ill-equipped to make a well-informed decision based on the information currently available.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and reasoned comparison of realistic alternatives, which is essential under the Environmental Impact Assessment regime. Instead of a thorough analysis of environmental effects, it offers a narrative of project

evolution. This approach does not adequately show that less harmful options have been properly identified, assessed, and selected in favour of more damaging solutions.

Moreover, there is a lack of transparent, evidence-based comparisons of alternative offshore locations, development scales, or design configurations. Notably, the application does not prove that the developer has genuinely considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. The sensitivity of the West Lewis coastline, coupled with the crucial role of proximity to shore in assessing impact, highlights the significance of this omission. Without such analysis, it cannot be concluded that the proposed siting represents the least damaging option.

This inadequacy extends to the assessment of cable routing and landfall, with insufficient evidence that alternative routes have been thoroughly examined to mitigate impacts on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The failure to provide a clear avoidance strategy and the lack of comparative analysis suggest that mitigation by design has not been implemented, relying instead on post-design measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy and hampers the competent authority's ability to determine if less harmful and more suitable alternatives exist. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal is a sustainable or policy-compliant option.

From a policy standpoint, these deficiencies undermine compliance with National Planning Framework 4, particularly in terms of safeguarding natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that leads to the conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed and fails to provide a comprehensive understanding of the ecological receptors present. This marine system is known for its high sensitivity and biological activity. However, the baseline data is incomplete, and the methodologies employed do not sufficiently capture species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a sound evidential foundation necessary for evaluating potential impacts.

A significant oversight is the assessment of otters, which are classified as a European Protected Species. The application does not adequately acknowledge or evaluate their active use of coastal regions for foraging and movement. By neglecting to consider their core foraging range and behavioural patterns, the assessment inadequately addresses the potential effects of construction disturbances, noise, and increased activity. This

gap undermines any claims regarding the absence of significant effects on this species.

Further shortcomings are evident in the evaluation of basking sharks, where the methodology relies on aerial surveys that carry inherent detection biases, particularly under Atlantic conditions. This approach is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate frequent utilisation of these waters. The failure to integrate or appropriately assess such data contributes to an incomplete baseline, diminishing the reliability of the conclusions drawn.

These methodological issues result in assertions of negligible or non-significant effects being grounded in assumptions rather than solid evidence. The lack of sufficient baseline data hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the criteria established by the Environmental Impact Assessment regime and National Planning Framework 4, as it has inadequately identified and assessed protected species. The uncertainty created by these deficiencies prevents the assurance that adverse effects can be excluded beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, the granting of consent would not be lawful.

In summary, the presence of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions collectively undermine the reliability of the assessment. These inadequacies obstruct a thorough evaluation of impacts on marine ecology and protected species and lead to the conclusion that the application does not possess a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamentally unreliable ornithological assessment, marked by significant gaps in evidence and contradictions that call its conclusions into question. It is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, where internationally important seabird populations, already in decline, reside. Despite this, the assessment fails to demonstrate convincingly that these species will not suffer adverse effects. The implications of displacement, collision risk, or habitat loss have not been adequately evaluated.

There is a crucial inconsistency within the application itself. While the developer concludes that there are no significant adverse effects, they simultaneously propose a Habitats Regulations derogation case, which only arises when significant harm is anticipated. This contradiction further undermines the reliability of the assessment and indicates that the conclusions drawn lack support from the underlying evidence.

Moreover, 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 has not been fully considered, and the reliance on modelling methodologies introduces substantial uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. It is likely that mortality rates are underestimated due to incomplete baseline data and an insufficient understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional significant risk, effectively creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term effects of sustained mortality within this corridor are not adequately assessed, raising concerns for species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to ascertain no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle and precludes a lawful conclusion in support of consent.

Additionally, the identified deficiencies contravene 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 creates a direct conflict with national policy.

In summary, the assessment is rendered unreliable by internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. These deficiencies hinder a robust evaluation of potential impacts and support the conclusion that the application fails to meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's approach to assessing social impacts, health, and wellbeing is inadequate and lacks necessary transparency. Although a Social Impact Assessment was commissioned, which included focus groups with local residents, the complete report remains unpublished. This creates a notable gap in evidence and restricts both public insight and the competent authority's understanding of the social risks identified by the developer's own research.

Residents are reportedly experiencing increased levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These effects arise from direct community engagement and are not based on speculation. However, without access to the full assessment, proper scrutiny of these findings is impossible, limiting the ability to evaluate their significance in the decision-making process.

Moreover, the proposal is viewed as a potential threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this recognition, such impacts have not been adequately reflected in the main application or given sufficient consideration. The lack of a complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This absence of transparency is detrimental to the Environmental Impact Assessment process. Understanding the full range of social, economic, and health impacts is critical for developments of this magnitude, especially when the character and functioning of the community may be at stake. By failing to provide the complete data set, the application does not offer a comprehensive evidential basis to weigh benefits against harm.

From a policy standpoint, the application does not align with National Planning Framework 4 regarding health and wellbeing. Development is expected to promote positive health outcomes and mitigate harm, yet the evidence at hand indicates significant adverse effects that have not been fully disclosed. Without the complete assessment, it is not possible to establish compliance with this policy.

The implications of these procedural shortcomings are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This omission constitutes a significant flaw in the application and a failure to meet the evidential standards required by the Environmental Impact Assessment framework.

Overall, the failure to disclose the complete Social Impact Assessment, along with evidence of current negative impacts, renders the assessment both incomplete and unreliable. This situation hinders a lawful determination and reinforces the assertion that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly lacking and does not adequately portray the sensitivity of the receiving environment or the scale of change involved. The coastline of West Lewis is characterised by an expansive Atlantic horizon, an undeveloped nature, and a pronounced sense of remoteness. The proposed introduction of large-scale turbines situated close to the shoreline would establish a continuous industrial presence, fundamentally altering this character and leading to a permanent transformation of the landscape.

The application fails to properly convey the magnitude of visual change associated with the turbines. Their scale and proximity would dominate the views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not sufficiently communicate the significance of this impact within the context of such a sensitive landscape.

Concerns also arise from the selection and presentation of visual viewpoints within the assessment. Evidence indicates that the chosen viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This situation raises the possibility that the visual impact has been underestimated, thereby compromising the reliability of the overall assessment.

Additionally, the assessment neglects to consider the interconnected relationship between landscape, seascape, and cultural heritage. Key sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these cultural assets in isolation rather than acknowledging 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 relationships, changing the context in which heritage assets are perceived and severing their connection to the natural horizon. This presents not just a visual impact but a wider cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural spaces and historical assets. The extent of change proposed is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally important sites. The lack of a comprehensive worst-case scenario analysis further weakens any assertion of compliance with policy requirements.

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 overwhelming and inescapable. The resulting change is therefore fundamentally permanent, rather than something that could be reduced to an acceptable level through mitigation measures.

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

CONSTRUCTION AND POLLUTION RISKS

The assessment related to construction and pollution risks is lacking in completeness and detail, making it difficult to evaluate potential environmental effects. The proposal entails significant 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, it depends on mitigation and contingency measures to be formulated after consent, which hinders any meaningful evaluation of their adequacy or effectiveness.

Given the sensitivity of the receiving environment, this reliance on undefined future measures raises significant concerns. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and possible accidental chemical or oil spills, it fails to provide sufficient information on the prevention, control, or monitoring of these risks.

There is also ambiguity surrounding the extent and behaviour of sediment plumes resulting from seabed disturbances and cable installation. Without comprehensive modelling and well-defined management strategies, it becomes impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty extends to the possible effects on marine species and habitats that have been recognised as sensitive in the broader assessment.

Compounding these concerns is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application prevents an assessment of whether adequate safeguards are in place to address pollution events. This creates procedural risks and undermines the capability of the competent authority to evaluate environmental protection measures at the determination stage.

From a regulatory standpoint, the delay in establishing critical environmental safeguards contradicts the Environmental Impact Assessment regime's requirements. Significant likely effects and necessary mitigations must be evaluated before consent, and in the absence of such information, a lawful determination cannot occur. Furthermore, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the deficiencies in defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts lead to a materially deficient assessment. These issues obstruct a thorough evaluation of construction and pollution risks and further substantiate the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal's assessment of marine life and fisheries is fundamentally inadequate, failing to provide a thorough examination of both ecological and socio-economic implications. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry, yet the application does not adequately ensure that these vital habitats and activities will remain protected and maintained without considerable disruption.

A notable concern is the unsubstantiated assumption that fishing activities can be displaced without repercussions. There is a lack of evidence indicating that alternative fishing grounds are available, accessible, or able to accommodate any increased pressure from displaced fishing. This absence of information is critical, as such displacement could lead to overfishing in other areas and may result in broader

economic ramifications for the local fishing fleet. Without a detailed and evidence-based evaluation, the implications for fisheries and local livelihoods are not fully understood.

Moreover, the proposal poses significant threats to marine species, particularly due to the underwater noise generated during construction activities. The use of high-energy hammer piling over an extended period is anticipated to cause disturbance across considerable distances, impacting species including dolphins. The forecasted disturbance to a substantial portion of the local bottlenose dolphin population raises alarming concerns, yet the application minimizes the importance of these effects without adequate supporting evidence.

Inconsistencies within the application are evident, as it acknowledges the necessity for licenses to permit harm to European Protected Species while simultaneously characterising impacts as negligible. This contradiction diminishes the credibility of the assessment and raises alarms regarding adherence to the Habitats Regulations, especially when harm is expected to an extent that warrants legal authorization.

The assessment also neglects to account for cumulative impacts stemming from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough assessment of these interconnected effects, the overall impact on marine ecosystems and socio-economic conditions remains undetermined.

From a policy standpoint, the application does not illustrate conformity with the National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with current marine users or evade unacceptable impacts on marine biodiversity, making it impossible to conclude that the proposal is sustainable.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves onshore infrastructure that has been inadequately assessed, failing to consider the full range of impacts arising from what constitutes a single integrated project. The onshore works, which include cabling across protected moorland and the construction of a substation near Stornoway, are intrinsically linked to the offshore turbines. This assessment is fragmented, obscuring the true scale of both environmental and socio-economic effects.

Significant onshore activities involve excavation across areas of deep peat, particularly within Barvas Moor, which serves as an important carbon store and ecologically sensitive habitat. The absence of a comprehensive assessment of these impacts limits the understanding of the project's overall environmental footprint. By deferring or

excluding the evaluation of onshore impacts, the application fails to facilitate a proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the separation of offshore and onshore elements results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

The proposal raises substantial concerns regarding sensitive habitats, including machair systems and peatland environments, which are protected by policy. There is no evidence that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, creating a significant evidential gap regarding biodiversity protection. Moreover, the disturbance of peatland could release stored carbon, thereby generating a carbon debt that runs counter to the goals of renewable energy development. The application does not sufficiently address this critical issue or demonstrate that the overall carbon balance is maintained as beneficial.

The routing of infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application lacks evidence indicating that the necessary consents or processes have been initiated, leading to concerns about both the deliverability and lawful implementation of the project.

From a policy standpoint, the failure to conduct a holistic assessment of the project and to demonstrate the protection of peatlands, habitats, and land use interests is at odds with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated significantly undermines the application. In conclusion, the separation of project components, the lack of comprehensive assessment, and the absence of evidence on environmental and land use impacts render this part of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

Additionally, there is no analysis of the effects on nocturnal wildlife. Species such as

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

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

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

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

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

TOURISM

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

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

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

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the criteria for sustainable development as required by statutory duties and national policy. It mirrors the critical issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the level of industrialisation. This new application, presented under a more robust policy framework, still falls short, particularly in areas concerning biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis for the proposal is incomplete and unreliable. There are substantial gaps in baseline data, the design envelope remains undefined, and there is an over-reliance on unspecified mitigation measures. Furthermore, vital impact pathways have been omitted, such as those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is not comprehensive and fails to provide a clear understanding of the likely significant effects or residual impacts.

Procedural shortcomings are evident, notably the lack of a compliant Island Communities Impact Assessment, which contravenes statutory obligations under the Islands (Scotland) Act 2018. Additionally, the omission of the complete Social Impact Assessment is a serious gap that hinders the competent authority's ability to evaluate

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

The proposal also contradicts National Planning Framework 4, as it does not adequately demonstrate protection for biodiversity, natural environments, and cultural heritage. Furthermore, it fails to show that health and wellbeing impacts are acceptable and does not provide evidence of a net economic benefit, particularly due to the lack of tourism impact analysis. The assessment of cumulative impacts from both offshore and onshore components is insufficient, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks persist, with incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The combination of informational deficiencies, policy inconsistencies, and unresolved environmental risks makes it impossible to arrive at a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuses consent based on these grounds or utilises the appropriate regulatory measures to compel the submission of the missing information.

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

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: 40957BE6

Member of the public 948

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 relevant marine licensing and Environmental Impact Assessment frameworks. The review of the Environmental Impact Assessment Report and associated documentation has revealed significant planning, environmental, cultural, and procedural deficiencies.

The proposal is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. However, the scale and design of the proposed development pose serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

Moreover, the application lacks an adequate evidential basis necessary for lawful determination. Missing critical environmental data, inconsistent baseline information, and undefined key aspects of the proposal contribute to a significant lack of clarity. The use of a flexible design framework complicates understanding of potential significant effects, while unestablished mitigation measures leave their efficacy unassessed. Consequently, this documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible effects unsupported by robust evidence.

Furthermore, there are evident policy conflicts present within the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not prove that it can meet national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests necessary for consent and hinder the competent authority's ability to determine the development's acceptability in policy terms.

Given the unprecedented scale of this proposal and the placement of large turbines close to the shoreline, significant concerns arise related to landscape capacity, visual dominance, and environmental impact. Collectively, the deficiencies in information, dependence on undefined mitigation, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is fundamentally flawed due to its reliance on an undefined design envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This creates considerable uncertainty and undermines the assessment's integrity, making it impossible to accurately evaluate worst-case scenarios. As a result, the impacts presented may not truly represent the development that is ultimately constructed, leaving both the public and the competent authority without a clear understanding of the environmental effects.

Moreover, the Environmental Impact Assessment Report is materially deficient, failing to provide a full and reliable account of the likely environmental impacts of the proposal. It depends heavily on undefined mitigation measures, monitoring strategies, and management plans, which have yet to be articulated. By seeking consent based on the premise that environmental harm will be addressed later, the application effectively precludes any meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. This deferral of critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be established prior to any determination.

Furthermore, there are notable evidential deficiencies present, including significant gaps in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. These shortcomings contribute to uncertainty regarding the scale and significance of impacts, especially when negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information hinders the ability to clearly understand cumulative and worst-case impacts, thereby introducing scientific uncertainties that cannot be reconciled with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations, which requires exclusion of adverse effects beyond reasonable scientific doubt. This triggers the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly with respect to biodiversity protection and environmental integrity, as it does not adequately show that impacts have been fully assessed or that appropriate safeguards are in place.

Overall, the combination of an undefined design envelope, unspecified mitigation measures, and insufficient baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies obstruct a lawful and robust assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to meet the statutory requirements of the Environmental Impact Assessment regime, as it does not provide a structured, reasoned comparison of realistic alternatives based on environmental effects. Instead, it presents a narrative

account of project evolution, which does not adequately demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

There is no evidence-based comparison of alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has seriously considered placing turbines further offshore, where impacts related to visual, ecological, and coastal issues would likely be mitigated. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in determining impact, the lack of such analysis means it cannot be concluded that the proposed siting is the least damaging option.

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The application fails to provide a reliable assessment of marine ecology and protected species, particularly within the highly sensitive West Lewis coastal environment. This area is known for its biological activity, yet the baseline data presented is incomplete, and the methodologies employed do not effectively capture species presence, behaviour, and habitat use. Consequently, there is insufficient evidence to evaluate potential impacts accurately.

A notable gap is found in the assessment of otters, a European Protected Species, where the application does not appropriately acknowledge their active use of coastal regions for foraging and movement. The oversight regarding their core foraging range and behavioural patterns leaves the potential effects of construction disturbance,

noise, and increased activity inadequately addressed. This undermines any conclusions suggesting no significant effects on the otter population.

In addition, the assessment of basking sharks is flawed due to its reliance on aerial surveys, which are subject to substantial detection bias, especially in Atlantic conditions. This method is likely to underestimate their presence compared to established land-based observations, which indicate frequent use of these waters. The omission of such relevant data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological shortcomings mean that the conclusions of negligible or non-significant effects rest on assumptions rather than solid evidence. Without adequate baseline data, it is impossible to conduct a 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 viewpoint, the application does not adhere to the Environmental Impact Assessment regime or National Planning Framework 4 standards, as there has been a failure to properly identify and assess protected species. The level of uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Thus, under these circumstances, consent cannot be granted lawfully.

Overall, the lack of complete baseline data, flawed methodologies, and unsupported conclusions collectively undermine the assessment's reliability. These issues obstruct a thorough evaluation of the impacts on marine ecology and protected species, leading to the conclusion that the application is founded on insufficient evidence.

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 of the cultural heritage and community identity associated with the proposed development is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are interconnected. This application adopts a reductive perspective, viewing heritage merely as a collection of isolated, static assets and neglecting their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming of the assessment is its treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices, yet they are categorised as static features in the assessment. This oversight neglects their continued significance and the potential impacts of development on their surroundings, leading to an incomplete evaluation of the cultural effects and disregarding their importance in community life.

Moreover, the assessment overlooks intangible cultural heritage, particularly the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are vital to the area's identity but are entirely absent from the evaluation, representing a considerable omission. The failure to consider such factors hinders a comprehensive understanding of the cultural impact of

the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity recognised as characteristic of an Indigenous People, yet there has been no process for Free, Prior and Informed Consent. This lack of meaningful engagement diminishes the legitimacy of the assessment and fails to adhere to established principles of participation in decisions affecting cultural and environmental interests.

Furthermore, a critical procedural failure is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority is unable to fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community. This alone obstructs a lawful determination of the proposal.

From a policy standpoint, the noted deficiencies place the proposal in direct opposition to National Planning Framework 4, particularly concerning the protection of historic assets and locations. The failure to account for both tangible and intangible heritage, as well as to recognise living cultural practices, constitutes a clear deviation from policy requirements.

In summation, the combined failures to assess living heritage, intangible cultural value, community rights, and statutory obligations result in a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application does not furnish a sufficient foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding social impacts, health, and wellbeing in this application is significant and undermines the necessary evaluation process. While the developer has conducted a Social Impact Assessment that involved local residents through focus groups, the full report remains unpublished. This creates a serious evidential gap, hindering both public understanding and the competent authority's ability to assess the social risks identified in the developer’s own research.

Available summaries reveal that local residents are facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct feedback from the community and are not mere speculation. However, without access to the complete assessment, it is impossible to scrutinise these findings fully, which limits the capacity to evaluate their significance in the decision-making process.

Additionally, there are indications that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer’s findings. Unfortunately, these concerns have not been adequately included in the main application or afforded the necessary weight. The failure to disclose the complete

Social Impact Assessment obscures the real human and social costs associated with the development.

This lack of transparency further complicates the Environmental Impact Assessment process. Understanding the social, economic, and health implications is vital for projects of this magnitude, especially when considering potential effects on community character and functioning. The application's omission of the full dataset results in an insufficient evidential basis to weigh the benefits against the harms.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and avoid causing harm, yet the evidence available suggests that adverse effects already exist and have not been fully disclosed. Without the complete assessment, it cannot be shown that the application complies with this policy.

The procedural consequences of this situation are considerable. The competent authority is unable to perform a thorough socio-economic and health evaluation due to the absence of the full Social Impact Assessment. This gap represents a material omission in the application and fails to satisfy the evidential requirements set out by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, alongside evidence of current 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 be supported.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual and environmental impacts is significantly inadequate, failing to capture the true extent of change and the sensitivity of the landscape. The character of the West Lewis coastline, marked by its open Atlantic horizon and undeveloped nature, embodies a strong sense of remoteness. The proposed large-scale turbines located near the shoreline would create an unbroken and overwhelming industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

The application lacks a thorough representation of the magnitude of this visual change. Given their scale and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations. This would directly diminish visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment does not adequately articulate this level of impact or its significance within such a sensitive landscape.

Methodological concerns arise in the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may fail to fully capture the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage

sites and high-value landscapes. This raises the possibility that the true magnitude of visual impact has been understated, thus undermining the credibility of the assessment.

Another critical shortfall is the lack of evaluation of the interconnected nature of landscape, seascape, and cultural heritage. Key sites like the Calanais Standing Stones and other Scheduled Monuments exist within a wider landscape context, linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these important assets as isolated, neglecting their interdependence and leading to an incomplete analysis of impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these essential connections, transforming how heritage assets are perceived and disrupting their relation to the natural horizon. This not only poses a visual impact but also inflicts broader cultural and spatial harm that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 concerning the protection of natural environments and historic assets. The proposed scale of change is fundamentally at odds with the necessity to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertions of compliance with policy requirements.

It is evident that the identified impacts are not amenable to effective mitigation. The scale, height, and proximity of the turbines would ensure their presence is both dominant and unavoidable. Consequently, the resulting change is fundamental and permanent, incapable of being reduced to an acceptable level through mitigation strategies.

Overall, the assessment falls short in accurately portraying the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the assertion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

The assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate the likely environmental effects. The proposal entails extensive seabed preparation and installation works in a high-energy Atlantic

environment, but it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it defers mitigation and contingency measures to a post-consent stage, which hinders any meaningful assessment of their adequacy or effectiveness.

There is considerable uncertainty regarding the scale and behaviour of sediment plumes generated by seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also encompasses potential effects on marine species and habitats that are already recognised as sensitive within the wider assessment.

Moreover, the absence of detailed emergency response procedures intensifies these issues. By postponing contingency planning until after consent, the application fails to allow for evaluation of whether adequate safeguards are in place to address pollution incidents. This approach not only introduces procedural risk but also undermines the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements outlined by the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to consent, and without this information, a lawful determination cannot be achieved. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application presents an inadequate assessment of fisheries and marine life, failing to provide a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry, yet the proposal does not convincingly demonstrate that these vital habitats and activities can be preserved without significant disruption.

A critical concern is the erroneous assumption that fishing activities can be displaced without negative consequences. The application lacks any evidence to support the availability of alternative fishing grounds that are both accessible and capable of handling additional pressure. This significant oversight raises the risk of overfishing in other areas, potentially leading to broader economic repercussions for the local fishing fleet. An absence of a clear, evidence-based assessment leaves the impacts on fisheries and local livelihoods poorly understood.

Moreover, the proposal poses considerable risks to marine species, particularly through the underwater noise generated during construction. The use of high-energy hammer piling over extended periods is expected to disturb marine life over large areas, including species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious alarms, yet the application diminishes the seriousness of these effects without adequate supporting evidence.

There exists a glaring inconsistency within the application, as it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously declaring such impacts to be negligible. This contradiction undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal approval.

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

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

In summary, the combination of insufficient evidence regarding fishing displacement, underestimation of acoustic impacts, and internal inconsistencies renders the assessment incomplete and unreliable. These shortcomings impede a thorough evaluation of the proposal's impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and fails to fully consider the impacts of what constitutes a single integrated project. The offshore turbines and onshore works are interconnected, yet they are evaluated separately, which leads to a fragmented approach that obscures the true scale of environmental and socio-economic effects.

The application includes significant onshore components, such as cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. However, the application does not provide a thorough assessment of these impacts, which prevents a comprehensive understanding of the project's overall environmental footprint.

There are serious risks to sensitive habitats, including machair systems and peatland

environments, which are protected by policy. The application has not demonstrated that impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This leads to a significant evidential gap concerning biodiversity protection.

Furthermore, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not offer evidence that the necessary consents or processes have been initiated, casting doubt on the deliverability and legality of the implementation.

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

By excluding or postponing the assessment of onshore impacts, the application fails to allow for an accurate evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered in conjunction, yet the distinct evaluation of offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities remain poorly understood.

In addition, the proposal raises alarms regarding carbon balance. The disturbance of peatland leads to the release of stored carbon, potentially resulting in a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this matter or show that the overall carbon balance is beneficial.

Ultimately, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts render this part of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to address the crucial aspects of dark skies and nocturnal wildlife, marking a significant omission. The West Lewis coastline boasts exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism, particularly for developing sectors like astro-tourism. However, the proposal includes permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect on the western horizon, fundamentally changing the night-time environment.

Furthermore, the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors has not been evaluated. This oversight is especially troubling given the importance of dark skies to the area's identity. The lack of consideration for these impacts results in a clear deficiency in the overall

environmental and landscape assessment.

Equally concerning is the complete absence of an evaluation of the effects on nocturnal wildlife. Sensitive species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are at risk from artificial lighting due to phototaxis, which can lead to disorientation and increased collision risks. The application lacks a lighting impact assessment or phototaxis study, failing to evaluate how the proposed aviation lighting might affect these species or contribute to mortality rates.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or its associated risks. Kittiwakes, for instance, may forage or migrate at night and are similarly vulnerable to disorientation caused by artificial lighting, yet this risk remains unexamined. The lack of site-specific night-time data results in 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 be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, thereby invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4 regarding the protection of natural places and environmental quality. It also detracts from a comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is an integral component of the overall environment.

In summary, the failure to assess dark skies and nocturnal wildlife creates a substantial evidential gap. Without baseline data, impact modelling, and species-specific analysis, the application remains incomplete and fails to support a lawful determination.

TOURISM

The proposed development brings serious concerns regarding its impacts on tourism, a vital component of the Isle of Lewis economy. With tourism being fundamentally reliant on the area's wild coastline, near-pristine landscape, dark skies, and the overall sense of remoteness, any industrialisation of the seascape may jeopardise this crucial sector. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide any quantified analysis regarding how large-scale offshore infrastructure would influence visitor numbers, behaviour, or the economic contribution of tourism.

Tourism has seen significant growth, with its value rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application lacks a model that considers how potential degradation of environmental quality may impact Tourism Gross Value Added and the

broader economic resilience of the community. Without this essential analysis, it remains unclear if the development would create a net economic benefit or threaten an established and flourishing sector.

Furthermore, the assessment neglects the critical role of environmental quality in sustaining tourism, such as the need for unspoiled landscapes and dark skies, which enhance the visitor experience and cater to emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further exacerbates this issue, leaving a substantial void in understanding how the proposal could affect this recognised and growing segment of the local economy.

In a context where economic diversification is limited for this island community, the lack of a thorough assessment of tourism impacts raises significant concerns regarding employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means these economic vulnerabilities remain unexamined, contrary to the requirements of the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly regarding economic impact and the obligation to prove net benefit. Additionally, it contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for competent authorities to evaluate the economic implications of the proposal.

Collectively, the inadequacies in quantifying tourism impacts, assessing environmental factors influencing visitor behaviour, and recognising the island's economic dependencies result in a significant evidential gap. This deficiency obstructs a thorough evaluation of the economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates significant deficiencies that undermine its compliance with the principles of sustainable development as dictated by statutory duties, national policy, and evidential standards. It mirrors the critical issues that resulted in the 2008 rejection of the Lewis Wind Power proposal, where the extent of industrialisation was deemed unacceptable. This new application is submitted under a more robust policy framework, which prioritises biodiversity, peatland preservation, landscape integrity, and community wellbeing, yet it fails to meet these vital requirements.

The evidential basis for the application is markedly incomplete and unreliable. Notably, there are substantial gaps in baseline data, the proposal relies on an undefined design envelope, and the mitigation measures suggested remain unspecified. Furthermore, important impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, have not been addressed. As a result, the Environmental Impact Assessment does not provide a comprehensive understanding of the potential

significant effects or residual impacts.

In addition to the shortcomings in evidence, there are also notable procedural flaws. The lack of a compliant Island Communities Impact Assessment constitutes a breach of the Islands (Scotland) Act 2018, while the failure to present a complete Social Impact Assessment signifies a material omission. Such deficiencies hinder the competent authority's ability to properly evaluate the impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application inadequate for determination.

The proposal is fundamentally at odds with the National Planning Framework 4. It does not establish adequate protection for biodiversity, natural environments, and cultural heritage, fails to demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit, particularly due to the absence of modelling regarding tourism impacts. Additionally, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring potential consequences for peatlands, carbon balance, habitats, and crofting land.

There are unresolved environmental risks that remain uncertain and potentially significant. The evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent with each other. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been reached, invoking the precautionary principle and precluding a lawful determination that impacts are acceptable.

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

Collectively, these issues render the application both procedurally and substantively unfit for determination. The vast scale of information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. It is incumbent upon the competent authority to refuse consent based on these grounds or to invoke the relevant regulatory provisions to demand the submission of the necessary missing information.

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

Additional Comments

I'm all for green technology especially when it comes to the generation of green energy but this is absolutely madness. The amount of damage this project will incur on the local environment and local businesses is beyond reasonable for any project even more so for a 'green' project.

And it's not just the size of the wind turbines but the required substation infrastructure and pylons required to connect it all to the grid along with the whole line needing upgrading in order to make use of the power generated.

Unless they are planning on turning them off when there's no local demand but still recieving payment for the electricity that they could have generated?

Also why is this going to be majority foreign owned? More profit going outside of the country whereas this should be government funding with any profits staying in the country.

The cost of electricity per KWH is around 25p in Scotland, in Canada it's around 11p, Northland Power is going to be making a killing on this deal whereas that money should be staying within the UK

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 6C2EFAA2

Member of the public 949

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns regarding the scale, proximity, and design of this proposal raise serious issues about its compatibility with statutory requirements and national policy, particularly in terms of sustainable development principles.

Critical environmental data is notably absent, and there is a lack of adequate baseline information, which is both limited and inconsistent. Key aspects of the proposal remain undefined, compounded by the use of a flexible design framework that hinders a clear understanding of the likely significant effects. The reliance on unspecified mitigation measures casts doubt on their potential effectiveness, leaving the documentation insufficient to provide a comprehensive understanding of the environmental, cultural, or community impacts. Consequently, assertions of negligible or non-significant effects lack robust supporting evidence.

There are significant policy conflicts associated with this application. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The proposal fails to demonstrate adherence to national requirements for protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests necessary for granting consent and impede the competent authority's ability to deem the development acceptable in policy terms.

Furthermore, the unprecedented scale of the proposal raises alarming concerns regarding landscape capacity, visual dominance, and environmental impact, given the positioning of large turbines in close proximity to the shoreline. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance suggests that the application is incomplete and cannot support a lawful determination. Under these conditions, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that undermine its reliability and transparency regarding the environmental effects of the proposal. It utilises a flexible Project Design Envelope, which lacks specific

commitments to turbine dimensions, layouts, or configurations. This absence of defined parameters introduces uncertainty and complicates the ability to apply a worst-case scenario consistently. Consequently, the impacts reported may not align with the development that is ultimately constructed, inhibiting both public understanding and the competent authority's ability to gauge the true environmental consequences.

Furthermore, the application is heavily contingent on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be addressed later impedes a thorough evaluation of effectiveness and an assessment of residual impacts. Such deferral of critical information to post-consent stages is procedurally unacceptable and runs counter to the intended purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures be clearly identified prior to determination.

The assessment also suffers from notable evidential weaknesses, including inadequacies in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty about the scale and significance of impacts, especially when conclusions suggest negligible or non-significant effects without robust supporting data. The lack of sufficient information prevents a clear understanding of cumulative and worst-case impacts, creating scientific uncertainty that is incompatible with statutory obligations.

As a result, the application does not fulfil the evidential requirements outlined in the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, since it cannot be shown that all impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings preclude a lawful and robust assessment of environmental effects, leaving the competent authority unable to determine the application based on the information currently available.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species presents significant shortcomings that compromise our understanding of the ecological receptors in the West Lewis coastal environment. This area is not only sensitive but also biologically active, yet the baseline data provided is insufficient. The methodologies employed do not adequately capture the presence, behaviour, and habitat use of various species, leading to a lack of sound evidential basis for evaluating potential impacts.

One critical oversight concerns otters, which are classified as a European Protected Species. The application fails to acknowledge their active foraging and movement along the coast, and neglects to assess their core foraging range and behavioural patterns. This oversight means the potential impacts of construction-related disturbances, including noise and increased activity, have not been thoroughly evaluated, undermining any assertions regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks demonstrates further deficiencies. The reliance on aerial surveys introduces substantial detection bias, particularly in challenging Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when juxtaposed with reliable land-based observations that indicate frequent utilisation of these waters. The neglect to include or appropriately assess such data contributes to an incomplete baseline and diminishes the reliability of the findings.

These methodological flaws result in conclusions regarding negligible or non-significant effects that are founded on assumptions instead of robust evidence. Moreover, the lack of adequate baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, which raises concerns about the true risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to identify or adequately assess the protected species involved. The uncertainty created by these deficiencies obstructs the possibility of excluding adverse effects beyond a reasonable scientific doubt, thereby necessitating the precautionary principle. In light of these issues, granting consent is not a lawful option.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsupported conclusions culminates in an unreliable assessment. These critical failings hinder a thorough evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application does not possess a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment associated with this application is fundamentally flawed, revealing significant gaps in evidence and internal contradictions that weaken its conclusions. The assessment fails to adequately demonstrate that the internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline, will not be adversely affected by the proposed development. Key foraging areas and migratory pathways are located within the development site, yet the implications of displacement, collision risk, and habitat loss are not robustly evaluated.

A notable inconsistency arises within the application, where the developer asserts no significant adverse effects while simultaneously pursuing a Habitats Regulations

derogation case, which is necessitated only when significant harm is anticipated. This contradiction casts doubt on the reliability of the assessment and highlights that the presented conclusions lack support from the underlying evidence. Furthermore, the assessment inadequately addresses the potential impact on seabirds linked to protected sites such as the Lewis Peatlands and St Kilda. The significance of these feeding grounds is not fully acknowledged, and the reliance on modelling approaches introduces uncertainty, particularly for species facing severe decline, like Kittiwakes and Fulmars. The methodologies employed are prone to underestimating mortality rates, especially when baseline data is incomplete and behavioural responses are not thoroughly understood.

The placement of turbines within a recognised migratory corridor adds further risk, effectively obstructing a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently analyse the long-term consequences of ongoing mortality within this corridor or the potential repercussions for species with relatively small global populations. From a regulatory standpoint, the application fails to meet the evidential threshold necessary to conclude no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, thereby obstructing a lawful conclusion in favour of consent.

Additionally, the identified deficiencies signify a failure to comply with the National Planning Framework 4 regarding biodiversity protection and the conservation of natural assets. The inability to prove 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 shortcomings, and lack of sufficient evidence. Such deficiencies prevent a thorough evaluation of impacts and lead to the conclusion that the application does not fulfil the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to recognise the West Lewis coastline as a living cultural landscape, where the connections between environment, language, tradition, and community are integral. It adopts a reductive perspective, viewing heritage merely as isolated and static entities, rather than acknowledging their continuous social, cultural, and spiritual significance within the community.

A notable shortcoming is evident in the treatment of culturally significant sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice; however, the assessment mischaracterises them as static features, neglecting their ongoing use, meaning, and the implications of development on their context. This oversight leads to an incomplete understanding of the cultural ramifications and disregards their importance to community life.

Moreover, the assessment does not address intangible cultural heritage elements, such as the Gaelic language and traditions, nor does it acknowledge the longstanding relationship between the community and the coastal environment. These factors are vital to the area's identity but are completely omitted from the evaluation, representing a considerable lapse. The cultural impact of the development cannot be adequately comprehended without these considerations.

There are additional concerns regarding community rights and engagement. The Gaelic-speaking population, characterised as an Indigenous People, has a unique cultural identity, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to adhere to established principles of participation in matters affecting cultural and environmental interests.

Furthermore, 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. Its absence means that the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic effects on the island community, which alone obstructs lawful determination.

From a policy standpoint, these deficiencies place the proposal at odds with National Planning Framework 4, particularly regarding the preservation of historic assets and sites. The neglect of both tangible and intangible heritage, along with the failure to recognise living cultural practices, clearly deviates from policy stipulations.

Ultimately, the collective failure to evaluate living heritage, intangible cultural value, community rights, and statutory obligations culminates in a significant evidential gap. The cultural effects of the development have not been sufficiently assessed, and the application lacks an adequate foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

Moreover, there is clear evidence that this proposal is perceived as a threat to

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development involves the introduction of large-scale turbines in close proximity to the West Lewis coastline, a region characterised by its open Atlantic horizon, undeveloped landscape, and strong sense of remoteness. This industrial presence would fundamentally alter the area's character, leading to a permanent and irreversible transformation of the landscape. The assessment of the visual and landscape impacts is materially deficient, failing to adequately represent the magnitude of change. The turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and eroding the defining qualities of naturalness and remoteness.

Moreover, there are methodological concerns surrounding the selection and presentation of visual viewpoints, as evidence suggests that they may not fully capture the most sensitive receptors or worst-case scenarios, particularly concerning significant cultural heritage sites and high-value landscapes. This raises the risk that the magnitude of visual impact has been understated, consequently undermining the reliability of the assessment.

A significant deficiency is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape setting that connects visually and spatially to the Atlantic horizon. The assessment inaccurately treats these sites as isolated, failing to recognise their interdependence and resulting in an incomplete evaluation of impacts on their settings and cultural significance. The industrialisation of the seascape would sever these critical relationships, fundamentally altering the context in which heritage assets are experienced and disrupting their connection to the natural horizon.

From a policy standpoint, the proposal conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is incompatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The absence of a thorough worst-case assessment further challenges any claims of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated due to the turbines' scale, height, and proximity, making their presence dominant and unavoidable. The change would be fundamental and permanent, incapable of being reduced to an acceptable level through mitigation efforts. Collectively, these deficiencies in the assessment fail to represent the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. This reinforces the conclusion that the proposal is incompatible with the necessary protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The current application presents an incomplete assessment of construction and pollution risks, failing to deliver the necessary detail to adequately evaluate the potential environmental impacts. It involves significant seabed preparation and installation activities in a high-energy Atlantic setting; however, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the proposal depends on mitigation and contingency measures that are to be formulated after consent is granted, thus hindering any substantive evaluation of their potential effectiveness or adequacy.

This reliance on unspecified future measures raises considerable concern, especially in light of the sensitive nature of the receiving environment. The coastline of West Lewis is home to clean coastal waters and crucial habitats that are susceptible to disturbance and contamination from sediment. Although the application acknowledges risks such as sediment mobilisation and the possibility of accidental spills involving chemicals or oil, it does not sufficiently outline the strategies to prevent, control, or monitor these occurrences.

Further uncertainty arises regarding the size and dynamics of sediment plumes that may result from the seabed disturbance and the installation of cables. The lack of robust modelling and explicitly defined management strategies renders it impossible to

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

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent has been granted, the application obstructs the evaluation of whether suitable safeguards are in place for responding to pollution incidents. This deferral introduces procedural risks and diminishes the capability of the competent authority to appraise environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the stipulations set forth by the Environmental Impact Assessment regime. Significant effects and proposed mitigations should be assessed prior to consent, and without this critical information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements that pertain to environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts culminate in an assessment that is materially deficient. These deficiencies prevent a thorough evaluation of construction and pollution risks, reinforcing the assertion that the application remains incomplete.

FISHERIES AND MARINE LIFE

The application provides an inadequate assessment of fisheries and marine life, lacking a thorough evaluation of both ecological and socio-economic impacts. Off the West Lewis coast, there exists a vibrant marine ecosystem and an active fishing industry. However, the proposal does not convincingly show that these habitats and uses can be safeguarded without significant disturbance.

A critical flaw is the assumption that fishing activities can be moved without any negative effects. The application fails to provide proof that alternative fishing grounds are not only available but also accessible and capable of handling the additional strain. This gap is crucial, as displacing fishing could lead to overfishing in other areas and might have broader economic repercussions for the local fleet. Without a solid, evidence-based assessment, the repercussions for fisheries and local livelihoods remain unclear.

Moreover, the proposed project poses significant risks to marine species, especially due to underwater noise produced during construction. Prolonged high-energy hammer piling is expected to disturb marine life over large distances, impacting species like dolphins. There are serious concerns regarding the projected disturbance to a notable portion of the local bottlenose dolphin population. Yet, the application minimizes the importance of these impacts without adequate supporting evidence.

Furthermore, the application contains contradictions, as it acknowledges the necessity of licences to allow harm to European Protected Species while simultaneously claiming the impacts are negligible. This inconsistency questions the reliability of the assessment and raises issues of compliance with the Habitats Regulations, especially where anticipated harm requires legal authorisation.

The evaluation also neglects to account for cumulative impacts resulting from various pressures such as habitat disruption, noise, and the displacement of fishing activities. Without a thorough examination of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately gauged.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to indicate that the development can coexist with current marine users or prevent unacceptable effects on marine biodiversity, thus hindering any conclusion that the proposal is sustainable.

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies compromise the assessment, rendering it incomplete and unreliable. These shortcomings obstruct a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the offshore turbines alongside the onshore works fails to provide a complete picture, as it treats these components separately despite their intrinsic connection. This fragmented approach obscures the full extent of environmental and socio-economic impacts of what is essentially a single integrated project. The onshore works entail cabling that crosses protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. Notably, excavation activities will take place in areas of deep peat, particularly within Barvas Moor, which is crucial both as a significant carbon store and as an ecologically sensitive habitat. The absence of a comprehensive assessment of these impacts prevents a thorough understanding of the overall environmental footprint of the project.

Moreover, the application's exclusion or deferral of onshore impacts hampers the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the disjointed assessment of offshore and onshore elements leads to an incomplete understanding of the combined effects on peatlands, habitats, and local communities. Significant risks to sensitive habitats, such as machair systems and peatland environments, have not been adequately addressed, which raises concerns regarding biodiversity protection and compliance with policy requirements. The application does not provide evidence that the impacts on these habitats have been fully assessed or that effective avoidance measures have been implemented, thus presenting a clear evidential gap.

The proposal further generates concerns around carbon balance, as the disturbance of peatland could release stored carbon, creating a carbon debt that contradicts the goals of renewable energy development. The failure to adequately address this aspect or to demonstrate that the overall carbon balance remains beneficial is a critical oversight. Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is a lack of evidence that the necessary consents or processes have been initiated, which casts doubt on the deliverability and lawful implementation of the project.

From a policy standpoint, the disjointed assessment of the project as a whole undermines the protection of peatlands, habitats, and land use interests, conflicting with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated adds further weakness to 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, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of assessments regarding dark skies and nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial for the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting that can be seen over long distances would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

The proposal fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly concerning given the vital role that dark skies play in the area's identity and the growth of emerging tourism sectors such as astro-tourism. The lack of consideration for these impacts creates a clear gap in the overall landscape and environmental assessment.

Moreover, there is no analysis of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and increased collision risks. The application lacks a lighting impact assessment or a phototaxis study, failing to address how aviation lighting may affect these species or contribute to increased mortality rates.

This issue is exacerbated by the reliance on daytime survey data for the ornithological assessment, which does not adequately capture nocturnal activity or related risks. Other species, such as Kittiwakes, that may forage or migrate at night are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data hinders the understanding of ecological impacts.

Without an evaluation of nocturnal impacts, it is impossible to determine if protected species or designated sites would be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be met, thereby invoking the precautionary principle and preventing a lawful determination.

From a policy standpoint, these omissions contradict the National Planning Framework 4 regarding the protection of natural spaces and environmental quality. They also weaken the broader assessment of landscape and seascape impacts since the character of night-time forms an essential element of the environment.

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

TOURISM

The assessment regarding the impacts on tourism is significantly lacking and does not adequately evaluate the economic and social ramifications for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, nearly unspoiled landscapes, dark skies, and a sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantifiable assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. Nevertheless, the application does not model the effects that the industrialisation of the seascape and the degradation of environmental quality would have on Tourism Gross Value Added or broader economic resilience. In the absence of such an analysis, it remains unclear whether the development would generate a net economic benefit or detract from an already established and expanding sector.

Moreover, the assessment neglects to account for the critical role that environmental quality plays in tourism, including the significance of unspoiled landscapes and dark skies in shaping visitor experiences and fostering emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, leaving a substantial gap in the understanding of the impacts on a recognised and growing segment of the local economy.

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

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

Planning Framework 4, particularly concerning economic impact and the necessity to illustrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence to enable the competent authority to evaluate the economic implications of the proposal.

In summary, the shortcomings in quantifying tourism impacts, assessing the environmental influences on visitor behaviour, and acknowledging 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 proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements for sustainable development according to statutory duties, national policy, and evidential standards. It echoes the issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application lacks a comprehensive evidential basis for decision-making.

There are significant gaps in the baseline data, an undefined design envelope is used, unspecified mitigation measures are relied upon, and crucial impact pathways are omitted. These include considerations for nocturnal wildlife, complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate and fails to provide a thorough understanding of likely significant effects or residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands (Scotland) Act 2018. Furthermore, the failure to present a complete Social Impact Assessment represents a serious omission. Such deficiencies hinder the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal contradicts National Planning Framework 4, as it does not sufficiently demonstrate protection of biodiversity, natural places, and cultural heritage. It fails to indicate acceptable health and wellbeing impacts and cannot prove a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been adequately evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments relating to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, thereby invoking the precautionary principle and barring a lawful conclusion about the

acceptability of impacts.

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

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

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

Additional Comments

The wind farms should be farther out in the Atlantic. Them being this close to the island would harm the wildlife of the Hebrides and negatively impact the islands tourism industries. There is absolutely no benefit for 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: 969F0C7B

Member of the public 950

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

Dear Sir/Madam

This objection serves as a formal challenge to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough examination of the Environmental Impact Assessment Report and accompanying documents reveals significant deficiencies across planning, environmental, cultural, and procedural dimensions. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, relatively untouched environment, and robust cultural identity. There are fundamental concerns regarding the proposal's alignment with statutory obligations, national policy, and the principles underpinning sustainable development, particularly due to its unprecedented scale, proximity to the shore, and design.

The application is deficient in providing a sound evidential basis necessary for a lawful determination. It lacks critical environmental data, offers limited and inconsistent baseline information, and leaves essential elements of the proposal undefined. The flexible design framework employed does not facilitate a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures raises questions about their effectiveness. Consequently, the documentation does not furnish a comprehensive understanding of the potential impacts on the environment, culture, or community, and claims of negligible or non-significant effects lack robust support.

There are substantive conflicts with established policy frameworks. 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 habitats, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies are critical as they directly relate to the statutory tests required for consent and hinder the competent authority’s ability to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal, particularly the positioning of large turbines in close proximity to the coastline, raises significant concerns about landscape capacity, visual impact, and overall environmental effects. Taken together, the lack of adequate information, dependence on undefined mitigation measures, evidential shortcomings, and clear non-compliance with policy indicate that the application is incomplete and cannot support a lawful determination. Therefore, it is imperative that the precautionary principle is invoked in this context.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and evidence-based assessment of alternatives, which is a crucial requirement of the Environmental Impact Assessment regime. Instead of presenting a reasoned comparison of realistic alternatives that considers their environmental effects, it merely offers a narrative of the project's development. This approach does not adequately demonstrate that less harmful options have been effectively identified and evaluated in favour of more damaging solutions.

The absence of a transparent comparison of alternative offshore locations, scales of development, or design configurations is particularly concerning. The application does not show that the developer has meaningfully considered placing turbines further offshore, where potential visual, ecological, and coastal impacts would likely be diminished. The West Lewis coastline is sensitive, and proximity to the shore significantly influences the overall impact. Without such analysis, it is impossible to conclude that the chosen siting is the least damaging option.

Deficiencies are also apparent in the assessment of cable routing and landfall, with insufficient evidence presented to support the exploration of alternative routes that could avoid or minimise impacts on sensitive receptors, including culturally significant sites like Barvas Cemetery. The lack of a clear strategy to avoid harm, coupled with inadequate comparative analysis, suggests a failure to apply mitigation by design, instead relying on post-design measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through site selection, layout, and routing of infrastructure. This represents a failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to determine whether more appropriate and less harmful alternatives exist. Without a thorough assessment of alternatives, it cannot be concluded that the proposal is sustainable or complies with policy requirements.

From a policy standpoint, this inadequacy jeopardises compliance with National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and the wellbeing of communities. The omission of a structured, comparative assessment is a significant shortfall that contributes to the overall conclusion that the application has not been sufficiently evaluated, thus precluding lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species is significantly flawed. It does not deliver a complete understanding of the ecological receptors in the West Lewis coastal area. This marine environment is sensitive and biologically vibrant, yet the baseline data used is lacking. The methodologies employed do not effectively capture the presence, behaviour, and habitat usage of various species. Consequently, the assessment fails to provide a reliable basis for understanding potential impacts.

A significant oversight is found in the treatment of otters, which are a European

Protected Species. The application does not adequately recognise or assess their active use of coastal zones for foraging and movement. The failure to consider their core foraging range and behavioural patterns means that the possible effects of disturbances from construction, noise, and increased activity have not been thoroughly evaluated. This lack of attention to otters undermines any claims about the absence of significant impacts on this species.

The assessment of basking sharks also shows notable deficiencies. The reliance on aerial surveys creates considerable detection bias, particularly in Atlantic conditions. Such an approach is likely to underestimate the presence of these sharks, especially when compared with established land-based observations that indicate frequent usage of these waters. Neglecting to incorporate or adequately assess this data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions about negligible or non-significant effects being based more on assumptions than on sound evidence. The insufficient baseline data also obstructs a meaningful examination of cumulative and indirect effects, including variations by season and interactions within the broader ecosystem. This results in uncertainty regarding the true extent of risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the requirements outlined in the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to identify or assess protected species properly. The uncertainty introduced by these deficiencies prevents the reasonable exclusion of adverse effects, thus necessitating the application of the precautionary principle. Under these conditions, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unfounded conclusions leads to an unreliable assessment. These issues hinder a thorough evaluation of the impacts on marine ecology and protected species and result in the overall determination that the application does not have a solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant flaws in its ornithological assessment, which is riddled with gaps in evidence and internal inconsistencies that undermine its conclusions. Seabird populations along the west coast of the Isle of Lewis, which hold international importance and are already experiencing decline, are not adequately protected as the application fails to meet the evidential standard necessary to demonstrate that these species will remain unaffected. Key foraging areas and migratory pathways are within the proposed development site, yet the assessment does not thoroughly evaluate the risks associated with displacement, collision, or habitat loss.

A striking contradiction arises in the application; the developer asserts that there will be no significant adverse effects while simultaneously proposing a Habitats Regulations

derogation case, which is only needed when significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the assessment, suggesting that the conclusions drawn lack support from the underlying evidence. Furthermore, the assessment does not convincingly show that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The assessment neglects the critical importance of these feeding grounds, and the reliance on modelling approaches adds uncertainty, particularly for species like Kittiwakes and Fulmars that are already in severe decline. The methodologies employed likely underestimate mortality rates, especially given the incomplete baseline data and insufficient understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor creates a substantial risk, effectively acting as a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application falls short in its assessment of the long-term consequences of sustained mortality in this corridor, as well as the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy 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 limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, which prohibits reaching a lawful conclusion in support of consent. Additionally, the deficiencies highlighted demonstrate non-compliance with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The failure to show that internationally significant seabird populations will not be adversely affected directly contradicts national policy.

In summary, the assessment's internal inconsistencies, methodological shortcomings, and inadequate evidence render it unreliable. These failures impede a thorough evaluation of the potential impacts and culminate in the conclusion that the application does not fulfil the statutory requirements needed for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal fails to adequately assess community rights and engagement, particularly concerning the Gaelic-speaking population, which embodies the characteristics of an Indigenous People. The absence of a Free, Prior and Informed Consent process significantly undermines the legitimacy of the assessment, ignoring established principles of participation essential for decisions impacting cultural and environmental interests.

Moreover, there is a critical procedural oversight in the lack of a compliant Island Communities Impact Assessment, a statutory requirement as stipulated by the Islands (Scotland) Act 2018. This deficiency hinders the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic implications for the island community, thereby preventing a lawful determination of the proposal.

The cultural heritage assessment is fundamentally flawed and does not recognise the West Lewis coastline as a dynamic cultural landscape where community, language, tradition, and environment are closely interlinked. Rather than acknowledging the ongoing social, cultural, and spiritual functions of heritage, the application adopts a reductive perspective, treating cultural assets as isolated and static entities.

Additionally, the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, is inadequate. These sites serve as active places for burial and spiritual practices but are mischaracterised as static features in the assessment. This oversight neglects their continued use and meaning, resulting in an incomplete evaluation of cultural impacts and disregarding their significance in community life.

Intangible cultural heritage, which encompasses the Gaelic language, traditions, and the community's historical relationship with the coastal environment, is also overlooked. These elements are integral to the identity of the area but are entirely absent from the assessment, creating a significant gap in understanding the cultural impact of the development.

From a policy standpoint, these shortcomings place the proposal in direct opposition to National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage, alongside the lack of recognition for living cultural practices, signifies a clear deviation from policy requirements.

Collectively, the oversight in assessing living heritage, intangible cultural value, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the development remain inadequately addressed, and the application does not furnish a sound basis for evaluating the actual cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment regarding social impacts, health, and wellbeing is fundamentally flawed and lacks the necessary transparency for a lawful evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents; however, the comprehensive report has not been made available. This creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full range of social risks highlighted by the developer's own research.

Evidence suggests that local residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct engagement and are not conjectural. Nonetheless, the absence of the full assessment restricts proper scrutiny of these findings, thus impairing the capacity to assess their significance in the decision-making process.

Additionally, the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. However, these impacts have not been adequately incorporated into the main application or given the necessary consideration. The non-disclosure of the complete Social Impact Assessment obscures the actual human and social costs associated with the development.

This lack of transparency fundamentally undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for projects of this magnitude, especially when there may be effects on community character and functionality. The failure to provide the complete dataset means the application does not offer a solid evidential foundation for evaluating the balance between benefits and detriments.

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

The procedural ramifications are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This constitutes a significant omission in the application, representing a failure to satisfy the evidential standards of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual, seascape, and landscape impacts presented in the application is severely lacking, failing to adequately address both the extent of changes anticipated and the sensitivity of the surrounding environment. The character of the West Lewis coastline, characterised by an open Atlantic horizon and a sense of remoteness, would be fundamentally altered by the introduction of large-scale turbines situated near the shoreline. This would create a pervasive industrial presence that would lead to a permanent and irreversible transformation of the landscape.

Furthermore, the application inadequately captures the scale of visual change that would result from the turbines. Their size and proximity would lead to domination of views from residential areas, historic sites, and prominent coastal locations, thereby negatively affecting visual amenity and undermining the defining characteristics of naturalness and remoteness. The assessment lacks an accurate portrayal of the

impacts and their significance within this sensitive landscape context.

Concerns also arise from the methodologies employed in selecting and presenting visual viewpoints. Evidence suggests that these viewpoints may not effectively depict the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage locations and valuable landscapes. Consequently, there is a risk that the magnitude of visual impact has been understated, which diminishes the reliability of the assessment.

Moreover, there is a failure to consider the interconnected relationships between the landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting that shares visual and spatial connections with the Atlantic horizon. The assessment treats these heritage assets as separate entities, neglecting their interdependence, which leads to an incomplete evaluation of the impact on their settings and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, affecting the context in which heritage assets are perceived and severing their connections to the natural horizon. This situation represents not only a visual detriment but also a broader cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal directly contravenes the National Planning Framework 4, which mandates the protection of natural environments and historic assets. The extent of the proposed changes is incompatible with the obligation to maintain landscape character, visual amenity, and the context surrounding culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of compliance with policy.

It is evident that the impacts identified cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence is dominant and unavoidable. Consequently, the alterations to the landscape would be fundamental and permanent, rather than something that could be sufficiently addressed through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks the necessary detail for a thorough assessment of construction and pollution risks, which is critical for evaluating potential environmental effects. Significant seabed preparation and installation works are planned within a high-energy Atlantic environment; however, there are no comprehensive Construction

Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application relies on future mitigation and contingency measures that are to be developed post-consent, inhibiting a meaningful assessment of their effectiveness or adequacy.

This reliance on unspecified future measures is particularly alarming, given the sensitivity of the receiving environment. The West Lewis coastline is known for its clean coastal waters and essential habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to offer sufficient detail regarding prevention, control, or monitoring measures.

Moreover, there is ambiguity regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without thorough modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these effects. This uncertainty also encompasses potential consequences for marine species and habitats identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application obstructs the evaluation of whether adequate safeguards exist to address pollution events. This introduces procedural risks and diminishes the competent authority's ability to assess environmental protection measures during the decision-making process.

From a regulatory standpoint, the deferral of vital environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and the corresponding mitigation measures must be evaluated before consent, and the absence of such critical information precludes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the 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 impede a robust evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of the proposed development's impact on fisheries and marine life is severely lacking, leading to significant concerns about ecological and socio-economic consequences. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry. However, the application does not adequately demonstrate how these vital resources can be safeguarded without causing major disruptions.

A critical flaw in the application is the assumption that fishing activities can simply be displaced without any repercussions. There is no evidence presented to suggest that alternative fishing grounds exist or that they could support the additional pressure created by such displacement. This gap is crucial, as it poses risks of overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a detailed and evidence-based assessment, the effects on fisheries and the livelihoods they support remain inadequately understood.

The proposal also raises significant risks for marine species, particularly due to the underwater noise generated during the construction phase. Extended periods of high-energy hammer piling are expected to cause disturbances across extensive areas, adversely affecting species such as dolphins. The application downplays the potential impact on a significant proportion of the local bottlenose dolphin population, raising serious concerns, yet it lacks sufficient evidence to support these minimal assessments.

Moreover, there is an evident inconsistency within the application, as it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously describing the anticipated impacts as negligible. This contradiction undermines the reliability of the assessment and raises questions about adherence to the Habitats Regulations, especially when harm is expected to the extent that it requires legal permission.

The assessment also neglects to account for cumulative impacts resulting from various pressures, such as habitat disruption, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it remains impossible to ascertain the overall impact on marine ecosystems and the socio-economic landscape.

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

In conclusion, the absence of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions found within the application collectively render the assessment incomplete and unreliable. These shortcomings obstruct a thorough evaluation of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves significant onshore infrastructure that is inadequately assessed and does not account for the comprehensive impacts of what constitutes a single integrated project. The separation of offshore turbines from onshore works leads to a disjointed evaluation, masking the true extent of environmental and socio-economic

consequences.

Onshore activities encompass the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, a vital carbon store and ecologically delicate environment. The absence of a thorough assessment of these impacts hinders a full understanding of the project's overall environmental footprint.

The deferral of onshore impact assessments obstructs a proper appraisal of cumulative effects. The Environmental Impact Assessment process mandates a holistic consideration of all project elements; however, the disconnection between offshore and onshore components means that the combined effects on peatlands, habitats, and local communities remain unclear.

Moreover, there are considerable risks to sensitive habitats, including machair systems and peatland ecosystems, which are afforded policy protection. The application fails to show that impacts on these habitats have been thoroughly evaluated or that effective avoidance measures have been put in place, highlighting a significant evidential gap in terms of biodiversity protection.

Concerns surrounding carbon balance also arise from the proposal. The disruption of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently address this issue or prove that the overall carbon balance remains advantageous.

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

From a policy standpoint, the failure to conduct a comprehensive assessment of the entire project and to demonstrate adequate protection of peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated significantly weakens the application.

In summary, the fragmentation of project components, the incomplete assessment, and the lack of evidence concerning environmental and land use effects render this aspect of the application unreliable and incomplete, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is notably deficient in its evaluation of dark skies and nocturnal wildlife, which constitutes a significant oversight. The West Lewis

coastline is renowned for its remarkably dark skies, integral to the area's environmental quality, cultural identity, and tourism appeal. The proposal to install permanent red aviation lighting would result in a pervasive and disruptive “wall of light” effect along the western horizon, which would drastically change the night-time environment.

There is a lack of assessment regarding the implications of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly critical given the area’s identity and the burgeoning astro-tourism sector that relies on preserving dark skies. The failure to evaluate these impacts introduces a notable gap in the overall landscape and environmental assessment.

Furthermore, there is no analysis of how such lighting may affect nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel exhibit heightened sensitivity to artificial lighting, which can cause disorientation and elevate collision risks. The absence of a lighting impact assessment or a phototaxis study means that the potential adverse effects of aviation lighting on these species, and the associated increase in mortality rates, remain unexamined.

This shortcoming is exacerbated by the dependence on daytime survey data in the ornithological assessment, which fails to account for nocturnal behaviours and associated risks. For instance, Kittiwakes, which may forage or migrate during the night, also face disorientation due to artificial light. The lack of site-specific night-time data creates a significant gap in understanding the ecological consequences.

Without a thorough examination of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be negatively impacted. The evidential standard required to demonstrate the absence of adverse effects beyond reasonable scientific doubt is not met, thereby invoking the precautionary principle and hindering lawful determination.

From a policy standpoint, the omissions in the assessment contradict National Planning Framework 4 regarding the safeguarding of natural environments and the quality of the environment itself. This lack of evaluation also detracts from a comprehensive assessment of landscape and seascape impacts, as the character of the night-time environment is a vital component of the overall setting.

In summary, the failure to address dark skies and nocturnal wildlife results in a significant evidential gap. The absence of baseline data, impact modelling, and targeted species analysis leads to an incomplete application that cannot adequately support a lawful determination.

TOURISM

The application does not adequately evaluate the potential impacts on tourism, which is a crucial sector for the Isle of Lewis economy. Tourism has significantly expanded, with revenues increasing from £65 million in 2017 to over £81.5 million, and it supports

more than 1,000 jobs, making up to 16% of the island's economy. However, the assessment neglects to model how the proposed large-scale offshore infrastructure could alter visitor numbers, behaviour, or overall economic contributions. Without this analysis, it is impossible to ascertain whether the development would generate a net economic benefit or jeopardise a vital and expanding sector.

Furthermore, the assessment overlooks the critical role of environmental quality in supporting tourism. The appeal of the area's wild coastline, unspoiled landscapes, dark skies, and sense of remoteness are central to the visitor experience. The omission of a Dark Skies Assessment exacerbates the issue, resulting in a considerable gap in understanding the impacts on growing segments of the local economy, such as nature-based tourism and astro-tourism.

The implications of these oversights extend beyond tourism alone. In an island community with limited economic diversification, failing to assess tourism impacts poses broader risks for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that the vulnerabilities facing the economy have not been evaluated as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4, especially regarding economic impact and the need to show net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector and does not furnish sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

In summary, the failure to quantify tourism impacts, assess the environmental drivers influencing visitor behaviour, and consider the island's economic dependency creates a significant evidential gap. This deficiency hampers 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 demonstrates significant shortcomings regarding sustainable development, as assessed against statutory obligations, national policies, and evidential standards. This proposal mirrors the issues that resulted in the refusal of the Lewis Wind Power application in 2008, when the scale of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it fails to address these crucial aspects adequately.

There are substantial gaps in the evidential basis required for a thorough determination of the application. Key areas such as baseline data, the ambiguous design envelope, unspecified mitigation measures, and the exclusion of critical impact pathways—including nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects—are notably lacking. Consequently, the Environmental Impact Assessment is

incomplete, hindering a full understanding of the likely significant effects and residual impacts associated with the proposal.

Additionally, procedural deficiencies are evident. The omission of a compliant Island Communities Impact Assessment violates statutory duties under the Islands (Scotland) Act 2018, while the failure to provide a complete Social Impact Assessment is a significant oversight. These inadequacies obstruct the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

In direct violation of National Planning Framework 4, the proposal fails to demonstrate adequate protection for biodiversity, natural spaces, and cultural heritage. There is no evidence that health and wellbeing impacts are acceptable, nor is there a demonstrated net economic benefit due to the lack of tourism impact modelling. The cumulative impacts from both offshore and onshore components have not been sufficiently evaluated, clouding the understanding of effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks persist and may be significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The evidential threshold needed to eliminate adverse effects beyond reasonable scientific doubt remains unmet, thereby activating the precautionary principle and preventing a lawful conclusion regarding the acceptability of the impacts.

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

When considering all these factors, the application proves to be procedurally and substantively unfit for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks obstructs a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuse consent on these grounds or invoke the appropriate regulatory provisions to compel the submission of the necessary missing information.

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

Additional Comments

I am an indigenous Scot with a deep love for this truly unique and beautiful land that is home to myself and others.

It beggars belief that yet again the wishes and legitimate concerns of the people are being completely ignored in preference to foreign companies who want to destroy our

land, coastlines, marine, wildlife and our wonderful dark skies purely for profit and let us be clear it is not for any altruistic reason it is only a money making scheme that does not benefit us in anyway.

These turbines have a limited life span once expired the companies involved will leave their trash behind like trashy day trippers rubbing their hands with glee with their increased profit margins and returns moving onto the next area they can destroy.

Yes I object to this with all my heart. Leave our country alone we do want you

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: 5F28197E

Member of the public 951

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

Dear Sir/Madam

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

The application lacks a sufficient evidential basis for a lawful decision. Key environmental data is absent, baseline information is inconsistent and limited, and several crucial elements of the proposal remain undefined. The adoption of a flexible design framework obscures the understanding of potential significant effects, while the reliance on unspecified mitigation measures renders it impossible to evaluate their efficacy. Consequently, the documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts involved, and the assertions of negligible or non-significant effects are unsubstantiated by robust evidence.

Furthermore, there are evident and substantial conflicts with policy. The proposal seems 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 provide assurance that national standards for protecting biodiversity, climate interests, and environmental integrity can be fulfilled. These discrepancies directly affect the statutory criteria required for consent and compromise the competent authority's ability to determine that the development is acceptable under policy frameworks.

The unprecedented scale of this proposal introduces large turbines positioned very near to the shoreline, raising major concerns about landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of adequate information, the reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species contains significant deficiencies that compromise its reliability and completeness, particularly concerning the West Lewis coastal environment. This marine system is known to be biologically active and sensitive, yet the data collected is incomplete, and the methodologies used fall short in adequately capturing species presence, behaviour, and habitat usage. Consequently, the evaluation lacks a solid evidential basis for understanding potential impacts.

Among the critical oversights is the treatment of otters, a species protected under European law. The application does not sufficiently recognise or assess their active use of coastal regions for foraging and movement. Ignoring their core foraging range and behavioural patterns means that the implications of construction-related disturbances, noise, and increased activity remain inadequately evaluated. This oversight undermines any claims regarding the lack of significant impacts on this species.

Furthermore, the assessment of basking sharks demonstrates additional shortcomings. The reliance on aerial surveys leads to considerable detection bias, particularly under Atlantic weather conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that highlight their frequent use of these waters. The failure to consider such data properly contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological flaws indicate that conclusions of negligible or non-significant effects are based more on assumptions than on robust evidence. The absence of sufficient baseline data hampers meaningful evaluations of cumulative and indirect impacts, including variations across seasons and broader ecosystem interactions. This introduces uncertainty about the actual risk levels faced by marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not adequately identified or assessed protected species. This uncertainty prevents the dismissal of adverse effects with reasonable scientific assurance, necessitating the application of the precautionary principle. Under these circumstances, it would not be lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents serious concerns regarding its compliance with regulatory standards, particularly in relation to the evidential threshold necessary to assert no

adverse effect on the integrity of protected sites. The presence of contradictions within the conclusions, along with data gaps and limitations in the modelling approaches, results in a failure to achieve the level of certainty required beyond reasonable scientific doubt. This inadequacy engages the precautionary principle, which raises significant legal issues regarding the validity of the application for consent.

Furthermore, the assessment lacks sufficient evidence to demonstrate that the internationally important seabird populations associated with protected areas such as the Lewis Peatlands and St Kilda will remain unaffected. The critical nature of these feeding grounds is not thoroughly addressed, and the reliance on modelling creates uncertainty, especially concerning declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate potential mortality, particularly when baseline data is lacking and the behavioural responses of these species are not fully understood.

Additionally, the siting of turbines within a recognised migratory corridor poses a substantial risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment fails to adequately evaluate the long-term consequences of sustained mortality within this corridor and the potential impacts on species with small global populations.

The assessment as it stands is fundamentally flawed, riddled with internal inconsistencies and methodological weaknesses that undermine the reliability of its conclusions. These deficiencies prevent a thorough evaluation of the potential impacts, leading to the conclusion that the application does not fulfil the statutory requirements necessary for determination. The implications of failing to protect biodiversity and natural assets under National Planning Framework 4 are clear, placing the proposal in direct opposition to national policy and raising urgent concerns about its overall validity.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the application is fundamentally flawed, particularly concerning the treatment of the West Lewis coastline. This area is a dynamic cultural landscape where environment, language, tradition, and community are interwoven. Instead of recognising this interconnectedness, the application adopts a reductive view that portrays cultural heritage as merely a collection of static assets, neglecting their active social, cultural, and spiritual roles within the community.

A notable shortcoming is the handling of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practice, yet the assessment treats them as fixed features, ignoring their ongoing use and significance. This misrepresentation leads to an inadequate understanding of cultural impacts and overlooks the vital role these sites play in community life.

Moreover, the assessment fails to address intangible cultural heritage, including the

Gaelic language, local traditions, and the longstanding connection between the community and the coastal environment. These elements are integral to the identity of the area, yet they are entirely omitted from the evaluation, creating a significant gap in understanding the cultural implications of the development.

Concerns also arise regarding the rights of the community and their engagement in the process. The Gaelic-speaking population possesses a unique cultural identity akin to that of an Indigenous People, but the absence of a Free, Prior and Informed Consent process compromises the integrity of the assessment. This lack of meaningful participation undermines the legitimacy of the findings and disregards established principles of engaging communities in decisions that affect their cultural and environmental interests.

Another critical procedural deficiency is the non-compliance with the statutory requirement for an Island Communities Impact Assessment as stipulated in the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot adequately evaluate the social, cultural, and economic implications for the island community, thereby rendering any determination unlawful.

From a policy standpoint, these failures place the proposal in conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect of both tangible and intangible heritage, along with the disregard for living cultural practices, clearly deviates from established policy requirements.

In summary, the overall lack of assessment concerning living heritage, intangible cultural value, community rights, and adherence to statutory obligations leads to a significant evidential gap. The application has not properly assessed the cultural impacts of the development, resulting in an insufficient basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

There is a clear indication that the proposal poses a threat to community identity and cohesion, with concerns regarding “cultural loss” identified in the developer's

preliminary findings. Despite these assertions, the impacts have not been adequately incorporated into the main application nor afforded the necessary importance in the evaluation process. The withholding of the full Social Impact Assessment obfuscates the genuine human and social costs associated with the development.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts and the relationship between landscape, seascape, and cultural heritage is fundamentally flawed, failing to adequately capture the scale of change and the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines, situated near the shoreline, would create an overwhelming industrial presence, fundamentally altering this character and leading to a permanent transformation of the landscape.

Moreover, the application does not sufficiently address the extent of the visual change. The size and closeness of the turbines would dominate views from nearby residential areas, historic sites, and popular coastal locations, thereby directly impacting visual amenity and diminishing the qualities of naturalness and remoteness. The assessment inadequately communicates the significance of this impact within the context of such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully reflect the most sensitive receptors or the worst-case scenarios, particularly concerning important cultural heritage sites and high-value landscapes. This oversight raises the possibility that the visual impacts have been underestimated, casting doubt on the reliability of the assessment.

Additionally, there is a notable failure to consider the interconnectedness of landscape, seascape, and cultural heritage. Key sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape linked by visual and spatial relationships to the Atlantic horizon. Instead of recognising their interdependence, the assessment treats these sites as isolated entities, leading to an

incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their connection to the natural horizon. This constitutes not just a visual impact but a wider cultural and spatial harm that remains inadequately assessed in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, particularly concerning the preservation of natural places and historic assets. The scale of transformation is inconsistent with the necessity to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further diminishes any assertion of policy compliance.

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

In summary, the assessment fails to accurately depict the extent of the impacts, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

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

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

Additionally, the assessment overlooks cumulative impacts from various pressures,

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a comprehensive assessment of onshore infrastructure, which is a crucial element of what constitutes a single integrated project. The offshore turbines and onshore works are inherently connected, yet their assessment is conducted separately. This fragmented approach obscures the true scale of both environmental and socio-economic impacts.

The onshore components encompass cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure through sensitive landscapes. Excavation activities will take place across areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and an ecologically sensitive habitat. The current application does not adequately assess these impacts, hindering a complete understanding of the project's overall environmental footprint.

By deferring or excluding an assessment of onshore impacts, the application undermines the ability to properly evaluate cumulative effects. The Environmental Impact Assessment process mandates that all project components are considered collectively. However, the division between offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain inadequately understood.

There are considerable risks posed to sensitive habitats, including machair systems and peatland environments that enjoy policy protection. The application fails to demonstrate that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented. This results in a significant evidential gap concerning biodiversity protection.

Concerns regarding carbon balance also arise from the proposal. Disturbances to peatland release stored carbon, potentially creating a carbon debt that runs counter to the aims of renewable energy initiatives. The application does not sufficiently address

this matter or prove that the overall carbon balance remains advantageous.

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

From a policy standpoint, the failure to evaluate the project in its entirety and to demonstrate the protection of peatlands, habitats, and land use interests contravenes the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further diminishes the validity of 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 part of the application incomplete and unreliable, thus impeding a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks any evaluation of dark skies and nocturnal wildlife, which constitutes a significant oversight. The West Lewis coastline is noted for its exceptionally dark skies, an essential aspect of environmental quality, cultural identity, and tourism potential. The proposed introduction of permanent red aviation lighting will be visible over considerable distances, creating a persistent and intrusive “wall of light” effect on the western horizon, which would drastically transform the night-time environment.

The application fails to assess the implications of this lighting on visual amenity, landscape character, or the experience of both residents and visitors. Given the crucial role dark skies play in the area’s identity and their relevance to emerging sectors such as astro-tourism, this omission is particularly concerning. This gap clearly undermines the overall landscape and environmental assessment.

Moreover, there is no examination of how nocturnal wildlife will be affected. Species including the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are highly sensitive to artificial lighting, which can result in disorientation and an increased risk of collision. The application neglects to include any lighting impact assessment or phototaxis study, failing to evaluate how the proposed aviation lighting could influence these species or lead to higher mortality rates.

The shortcomings are exacerbated by the dependency on daytime survey data in the ornithological assessment, which does not address nocturnal activities or the related risks. Kittiwakes, known to forage or migrate at night, are also susceptible to disorientation caused by artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data leads to a significant 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 might be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4 regarding the protection of natural areas and environmental quality. It also detracts from the comprehensive evaluation of landscape and seascape impacts, as the night-time character is a vital element of the environment.

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

TOURISM

The application acknowledges that 86% of visitors are attracted by the area's scenery. However, it fails to provide a quantified analysis of how large-scale offshore infrastructure could potentially affect visitor numbers, their behaviour, or the overall economic contribution of tourism, which is a key sector of the Isle of Lewis economy. 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. Despite this, the application does not model the potential impact of industrialising the seascape or the loss of environmental quality on Tourism Gross Value Added or the broader economic resilience of the community.

The assessment neglects to address the crucial role that environmental quality plays in supporting tourism. The significance of unspoiled landscapes and dark skies cannot be overstated, especially in relation to visitor experience and emerging markets such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this issue, leaving a considerable gap in understanding the impacts on these important aspects of the local economy.

In a community where economic diversification is already limited, the lack of an assessment regarding tourism impacts has broader implications for employment, local businesses, and the sustainability of the community. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been 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 concerning economic impact and the obligation to provide evidence of net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence for competent authorities to assess the economic consequences of the proposal.

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

SUMMARY

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

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

Moreover, clear procedural lapses are present. The lack of a compliant Island Communities Impact Assessment violates the statutory requirements outlined in the Islands (Scotland) Act 2018, and the failure to provide the full Social Impact Assessment constitutes a significant omission. These shortcomings impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

This proposal directly contradicts the principles established in National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural environments, and cultural heritage. The application fails to show acceptable health and wellbeing impacts and lacks evidence of net economic benefits due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been appropriately evaluated, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

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

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

landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and the impacts on tourism represent permanent changes that cannot be adequately mitigated.

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

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

Additional Comments

This must be stopped at all costs. The detriment to the isles and the people who call it home have not been considered

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: 9917496C

Member of the public 952

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 supporting documents has uncovered material deficiencies in planning, environmental considerations, cultural impacts, and procedural adherence. The site 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 arise regarding the proposal's scale, proximity, and design, particularly in relation to statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis necessary for lawful determination. It is evident that critical environmental data is absent, baseline information is both limited and inconsistent, and essential aspects of the proposal remain undefined. The flexible design framework employed obscures a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, while assertions of negligible or non-significant effects are not substantiated by robust evidence.

Policy conflicts are both clear and substantive. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests required for consent and impede the competent authority's capacity to determine the development's acceptability from a policy perspective.

The unprecedented scale of the proposal presents significant concerns regarding landscape capacity, visual dominance, and environmental impact, with large turbines positioned near the shoreline. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and unsuitable for lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks essential information, rendering it materially deficient in its account of the potential environmental effects of the proposal. A flexible Project Design Envelope is employed, which does not commit to specific turbine dimensions, layouts, or configurations. This flexibility introduces significant uncertainty and hinders the application of a worst-case scenario, thereby compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development that will ultimately be constructed, obstructing both the public and the competent authority from fully comprehending the actual environmental effects.

Additionally, the application is predicated on mitigation measures, monitoring strategies, and management plans that remain undefined. Consent is sought under the premise that any environmental harm will be addressed at a subsequent stage. This approach inhibits a meaningful evaluation of the effectiveness of these measures and the assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally unacceptable and contravenes the intended purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and corresponding mitigations be clearly established prior to determination.

Furthermore, significant evidential deficiencies arise from gaps in baseline data, limitations in methodology, and an overreliance on assumptions instead of site-specific evidence. These issues lead to uncertainty surrounding the scale and significance of impacts, particularly when negligible or non-significant effects are asserted without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory requirements.

As a result of these shortcomings, the application fails to satisfy the evidential threshold mandated under the Habitats Regulations, which requires exclusion of 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, particularly concerning biodiversity protection and environmental integrity, as it cannot be established that the impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the reliance on an unspecified design envelope, the absence of clearly defined mitigation, and the existence of gaps in baseline data contribute to the unreliability and incompleteness of the Environmental Impact Assessment Report. These deficiencies hinder a lawful and robust assessment of environmental effects, placing the competent authority in a position where it cannot appropriately determine the application based on the information available.

ASSESSMENT OF ALTERNATIVES

The application fails to meet the statutory requirements of the Environmental Impact Assessment regime due to a materially inadequate assessment of alternatives. Instead

of providing a well-structured and reasoned comparison of realistic alternatives based on environmental effects, it offers a narrative account of project evolution. This method does not adequately demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

The assessment lacks a transparent and evidence-based comparison of alternative offshore locations, development scales, and design configurations. Notably, the application does not show that the developer has seriously considered positioning turbines further offshore, an action that could potentially reduce visual, ecological, and coastal impacts. The West Lewis coastline's sensitivity and the significance of proximity to shore in determining impact highlight the inadequacies in this analysis, preventing any conclusion that the proposed siting is the least damaging option.

Furthermore, the deficiencies are evident in cable routing and landfall assessment, where there is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The absence of a clear avoidance strategy, combined with a lack of comparative analysis, indicates a failure to apply mitigation by design, relying instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This oversight signifies a failure to adhere to the established mitigation hierarchy, thereby limiting 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 affirmed that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, this shortcoming undermines compliance with 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 significant omission that contributes to the overall determination that the application has not been thoroughly evaluated and cannot sustain a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed and does not offer a reliable understanding of ecological receptors in the West Lewis coastal area. This region is biologically rich and sensitive, yet the baseline data is lacking, and the methodologies employed do not adequately capture the presence, behaviour, and habitat usage of various species. Consequently, the assessment fails to present a sound evidential basis for evaluating potential impacts.

Significant concerns arise regarding otters, which are classified as a European Protected Species. The application neglects to properly acknowledge their active foraging and movement within coastal regions. The failure to consider their core

foraging range and behavioural patterns raises questions about the adequacy of assessing potential disturbances from construction activities, noise, and increased human presence. This oversight undermines any conclusions drawn about the absence of significant effects on otters.

Furthermore, the assessment of basking sharks is similarly inadequate, as it relies heavily on aerial surveys that introduce a significant detection bias, particularly under Atlantic conditions. This approach risks underestimating their presence in these waters, especially when juxtaposed with established land-based observations that indicate frequent usage. The neglect to incorporate or properly evaluate such data contributes to an incomplete baseline and diminishes the reliability of the presented conclusions.

These methodological shortcomings mean that any conclusions suggesting negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of comprehensive baseline data also hampers the assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, creating uncertainty about the actual risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to accurately 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. In light of these issues, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposal for development on the west coast of the Isle of Lewis raises significant concerns regarding its impact on internationally important seabird populations, many of which are already in decline. The ornithological assessment associated with this application is flawed, featuring considerable gaps in evidence and inconsistencies that compromise its conclusions. Key foraging areas and migratory pathways for seabirds are located within the proposed development site, yet the assessment fails to adequately evaluate the potential implications of displacement, collision risk, or habitat loss.

There is a critical contradiction in the application, where the developer concludes that no significant adverse effects are anticipated while simultaneously making a Habitats Regulations derogation case, which is typically invoked only when significant harm is expected. This inconsistency raises doubts about the reliability of the assessment and

suggests that its conclusions are not substantiated by the necessary evidence. The evaluation does not sufficiently demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected, and it inadequately considers the importance of these feeding grounds. Furthermore, the reliance on modelling methods introduces uncertainty, particularly for species facing severe declines, like Kittiwakes and Fulmars, with the methodologies likely to underestimate mortality due to incomplete baseline data and insufficient understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor creates a significant risk by obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not thoroughly investigate the long-term consequences of sustained mortality within this corridor or the potential repercussions for 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 effects on the integrity of protected sites. The combination of contradictory findings, data deficiencies, and modelling limitations indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This engages the precautionary principle and renders any conclusion in favour of consent unlawful. The identified deficiencies also signify non-compliance with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to prove 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 flaws, and inadequate evidence. These shortcomings hinder a thorough evaluation of potential impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally insufficient, failing to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are intricately linked. The application adopts a reductive perspective, treating heritage merely as a collection of isolated and static assets, neglecting their continuous social, cultural, and spiritual significance within the community.

A notable shortcoming is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practice; however, the assessment categorises them as static features. This mischaracterisation overlooks their ongoing use, meaning, and the implications of development on their surroundings, leading to an incomplete evaluation of cultural effects and disregarding their importance in community life.

Moreover, the assessment fails to include intangible cultural heritage, such as the Gaelic language and traditions, along with the long-standing relationship the community maintains with the coastal environment. These aspects are central to the area's identity but are entirely absent from the evaluation, marking a significant omission. The absence of these factors hinders a proper understanding of the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which possesses a distinct cultural identity aligned with recognised characteristics 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 does not reflect established principles of participation in decisions affecting cultural and environmental interests.

Additionally, there is a critical procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these deficiencies place the proposal in direct opposition to National Planning Framework 4, particularly regarding the preservation of historic assets and places. The failure to consider both tangible and intangible heritage, as well as to acknowledge living cultural practices, represents a clear deviation from policy requirements.

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not furnish a solid foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment significantly undermines the evaluation of social impacts, health, and wellbeing associated with the proposal. Although the developer engaged with local residents through focus groups, the complete report remains unpublished. This evidential gap impedes both public understanding and the competent authority's ability to assess the full extent of social risks identified in the developer’s own research.

Available summaries reveal that residents are already facing measurable stress, anxiety, and concern directly linked to the scale and proximity of the proposed development. These impacts are based on direct engagement rather than speculation. Nonetheless, the absence of the full assessment restricts proper scrutiny of the findings and hinders the determination of their significance in the decision-making process.

Moreover, there are indications that the proposal is viewed as a direct threat to community identity and cohesion, with references to “cultural loss” appearing in the developer’s findings. However, these impacts have not been adequately reflected in the main application or assigned appropriate weight. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This situation adversely affects the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning may be at risk. By failing to provide the complete dataset, the application lacks a solid evidential basis for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. It is imperative that developments promote positive health outcomes and mitigate harm; however, the evidence presented indicates existing adverse effects that remain inadequately disclosed. Without access to the complete assessment, demonstrating compliance with this policy becomes impossible.

The procedural implications of this situation are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment, marking a material omission within the application that fails 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 current adverse impacts, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual and landscape impacts associated with the proposed development is fundamentally flawed and does not adequately convey the scale of change or the sensitivity of the environment. The coastline of West Lewis is characterised by its expansive Atlantic views, its undeveloped nature, and a profound sense of isolation. The planned installation of large turbines near the shoreline would impose an overwhelming industrial presence that would drastically alter this landscape, leading to a permanent and irreversible change in its character.

Moreover, the application fails to adequately represent the extent of visual change anticipated. The scale and proximity of the turbines are such that they would overshadow views from residential zones, historic sites, and popular coastal areas. This would significantly diminish visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment has not effectively communicated the severity of these impacts or their significance within this sensitive landscape context.

Methodological shortcomings further undermine the evaluation, especially regarding the selection and representation of visual viewpoints. It appears that some viewpoints do not sufficiently capture the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises concerns that the actual magnitude of visual impact has been understated, casting doubt on the assessment's overall reliability.

Additionally, there is a critical oversight in evaluating the interconnectedness of landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially tied to the Atlantic horizon. The assessment treats these assets in isolation without acknowledging their interdependence, leading to an incomplete understanding of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these connections, changing the context in which these heritage assets are appreciated and breaking their link to the natural horizon. This not only results in visual impacts but also inflicts broader cultural and spatial damage that the application has not adequately addressed.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4, particularly concerning the safeguarding of natural places and historic assets. The extent of change proposed is fundamentally incompatible with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case scenario assessment further weakens any argument of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be dominant and impossible to overlook. The resulting transformation of the landscape is thus fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation efforts.

In summary, the assessment inadequately reflects the scale of impact, the sensitivity of the environment, and the interrelatedness of landscape and heritage. These significant deficiencies hinder a reliable evaluation and reinforce the conclusion that this proposal is not compatible with the protection of the landscape.

CONSTRUCTION AND POLLUTION RISKS

The application lacks crucial details needed to assess the risks associated with construction and pollution. It includes substantial seabed preparation and installation in a high-energy Atlantic setting, yet it does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures to be created after consent, which hinders any meaningful evaluation of their adequacy and effectiveness.

This reliance on unspecified future measures raises concerns about the sensitivity of

the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges potential risks, such as sediment mobilisation and accidental chemical or oil spills, it lacks sufficient information on prevention, control, or monitoring strategies.

There is significant uncertainty regarding the size and behaviour of sediment plumes resulting from seabed disturbances and cable installation. Without robust modelling and well-defined management strategies, it is impossible to assess the extent, duration, or ecological effects of these impacts. This uncertainty also extends to effects on marine species and habitats that have been identified as sensitive in the broader assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application restricts the evaluation of whether adequate safeguards are available to manage pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the time of decision-making.

From a regulatory standpoint, delaying essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed before consent is granted, and the absence of this information means that a lawful determination cannot be made. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the deficiencies in defined mitigation measures, detailed management plans, and clarity on potential impacts render the assessment materially inadequate. These issues prevent a comprehensive evaluation of construction and pollution risks and further indicate that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding the protection of marine species, particularly in relation to the underwater noise that will be generated during construction. The anticipated high-energy hammer piling could cause disturbances over considerable distances, with potential impacts on species such as dolphins. The predicted disturbance to a significant proportion of the local bottlenose dolphin population is alarming. However, the application appears to minimise the importance of these effects, lacking sufficient supporting evidence to justify such an oversight.

Moreover, the assessment of fisheries and marine life is inadequate, failing to provide a thorough evaluation of the ecological and socio-economic impacts. The waters off the West Lewis coast are home to both a vibrant marine ecosystem and a thriving fishing industry. Nevertheless, the application does not adequately demonstrate that these vital uses and habitats can be safeguarded from significant disruption.

A key concern lies in the assumption made by the applicant that fishing activity can be displaced without any repercussions. There is a notable absence of evidence indicating that alternative fishing grounds are available, accessible, or capable of accommodating additional pressure. This lack of information is particularly concerning, as displacement could lead to overfishing in other areas and may have broader economic ramifications for the local fishing fleet. The absence of a clear and evidence-based assessment means that the potential impacts on fisheries and local livelihoods remain poorly understood.

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

There are also discrepancies within the application regarding the need for licences to allow harm to European Protected Species. While the application acknowledges this requirement, it simultaneously describes potential impacts as negligible. This contradiction diminishes the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed onshore infrastructure is inadequate and does not fully address the impacts of what constitutes a singular integrated project. The offshore turbines and onshore activities are interconnected, yet they are evaluated independently, leading to a disjointed assessment that fails to reveal the comprehensive scale of environmental and socio-economic consequences.

Significant elements of the onshore works comprise cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access routes through fragile landscapes. These construction activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as an important carbon store and is an ecologically sensitive habitat. The application

lacks a thorough examination of these impacts, obstructing a complete understanding of the project's overall environmental footprint.

By omitting or delaying the assessment of onshore impacts, the application hinders the accurate evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project components be evaluated collectively. However, the division of offshore and onshore elements prevents a full comprehension of the combined impacts on peatlands, habitats, and local communities.

Additionally, there are significant risks posed to sensitive habitats, including machair systems and peatland environments that are protected by policy measures. The application fails to show that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, leading to a clear evidential gap in the context of biodiversity protection.

Concerns also arise regarding the carbon balance implications of the proposal. Disturbance of peatland may release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently tackle this concern or prove that the overall carbon balance remains advantageous.

Furthermore, the routing of infrastructure through active croft land could lead to conflicts with established land use and legal rights. There is a lack of evidence that the essential consents or processes have been initiated, raising doubts about the project's feasibility and lawful execution.

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

Collectively, the disjunction of project components, the absence of comprehensive assessments, and the lack of substantiation regarding 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 does not 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 are important for environmental quality, cultural identity, and tourism. The proposed development would introduce permanent red aviation lighting that would be visible from long distances, creating a persistent and intrusive "wall of light" effect across the western horizon. This change would fundamentally disrupt the night-time environment.

Moreover, the application fails to consider the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. The importance of dark skies for the area's identity and for growing tourism sectors like astro-tourism cannot be overstated. The lack of assessment creates a gap in the overall landscape and environmental evaluation.

There is also no assessment of how nocturnal wildlife may be affected. 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 does not contain any lighting impact assessment or phototaxis study, failing to address how the aviation lighting may affect these species or contribute to increased mortality.

This issue is aggravated by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activity and associated risks. Kittiwakes, for example, may forage or migrate at night and could also be disoriented by artificial lighting, yet this risk has not been evaluated. The absence of site-specific night-time data leads to a critical gap in understanding ecological effects.

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

From a policy standpoint, this omission contradicts National Planning Framework 4 regarding the protection of natural places and environmental quality. It also weakens the overall assessment of landscape and seascape impacts, as the character of night-time environments is essential to the broader context.

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

TOURISM

The application acknowledges that 86% of visitors to the Isle of Lewis are attracted by scenery, yet it fails to provide a quantified assessment of how large-scale offshore infrastructure may impact visitor numbers, behaviour, or the overall economic contribution from tourism. This sector relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Despite tourism's growth, 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, the assessment neglects to model the potential effects of industrialisation on the seascape and loss of environmental quality on Tourism Gross Value Added and broader economic resilience.

Furthermore, the application does not consider the essential role of environmental quality in sustaining tourism. The importance of unspoiled landscapes and dark skies for visitor experiences is particularly relevant to emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, resulting in a significant gap in understanding the impacts on a key aspect of the local economy.

In a community with limited economic diversification, the inadequate assessment of tourism impacts carries broader implications for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been adequately evaluated, which is a requirement under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, especially regarding economic impact and the necessity to show a 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.

Overall, the failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and consider the island's economic dependency results in a substantial evidential gap. This lack of analysis hinders a robust 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 fails to meet the essential criteria of sustainable development as outlined by statutory duties, national policy, and evidential standards. It mirrors the principal issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. This current application is presented under a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still falls short.

The evidential basis for the application is incomplete and unreliable. There are significant gaps in the baseline data, an undefined design envelope is used, and there is a reliance on unspecified mitigation measures. Moreover, key impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and effects on tourism are omitted. Consequently, the Environmental Impact Assessment is insufficient, failing to provide a clear understanding of likely significant effects or residual impacts.

Procedural issues are evident as well. The lack of a compliant Island Communities Impact Assessment breaches the statutory duty under the Islands (Scotland) Act 2018, and the failure to fully disclose the Social Impact Assessment is a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Additionally, the proposal conflicts with the National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural places, or cultural heritage. It fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of offshore and onshore components have not been assessed appropriately, which clouds the understanding of impacts on peatlands, carbon balance, habitats, and crofting land.

There are also significant uncertainties regarding environmental risks. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and at times inconsistent. The required evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been met, activating the precautionary principle and precluding any lawful conclusion about the acceptability of impacts.

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

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

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

Additional Comments

I still can’t believe, that with 80% local opposition, that permission for this license rushed through during Covid when local opposition could not be mustered and with the financial and environmental legacy that it will cost this island that this project is being considered.
Every rational argument against are being ignored, decision makers need to listen and not ignore objections as irrelevant.

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: B7AE5105

Member of the public 953

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is fundamentally flawed due to significant deficiencies in the Environmental Impact Assessment Report, which fails to provide a comprehensive and reliable account of the potential environmental effects associated with the proposal. The adoption of a flexible Project Design Envelope, lacking definitive turbine dimensions and configurations, creates considerable uncertainty and undermines the ability to apply a worst-case scenario consistently. This deficiency compromises the integrity of the assessment, resulting in impacts that may not accurately represent the final development, thereby obstructing the public and the competent authority from grasping the true environmental consequences.

Moreover, the application places undue reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be addressed later hampers any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's intent, which necessitates that significant effects and mitigation measures are explicitly established before determination.

There are substantial evidential shortcomings, including gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Consequently, there is ambiguity surrounding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects lack robust supporting data. The inadequacy of information hinders a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is not reconcilable with statutory obligations.

Consequently, the application does not satisfy the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, which encompasses requirements for biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that adequate safeguards are implemented.

Collectively, the dependence on an ambiguous design envelope, the lack of specified mitigation measures, and the deficiencies in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and thorough evaluation of environmental effects, placing the competent authority in a position where it cannot adequately determine the application based on the information available.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives in the application is fundamentally insufficient, failing to adhere to the statutory requirements of the Environmental Impact Assessment regime. It does not provide a structured and reasoned comparison of realistic alternatives based on environmental impacts; instead, it offers a narrative of the project's development. This approach does not adequately show that the developer has identified, assessed, and selected less harmful options over more damaging solutions.

There is an evident lack of transparent and evidence-based comparisons of alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has seriously considered the possibility of placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts could be minimised. Considering the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impact, the absence of such analysis raises significant concerns about the siting decision's potential to be the least damaging option.

Further deficiencies are present in the cable routing and landfall assessment, as there is inadequate evidence showing that alternative routes have been thoroughly investigated to avoid or reduce impacts on sensitive receptors, including 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 implemented, relying instead on measures that would come into effect post-design.

Consequently, the application fails to establish that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This situation indicates a failure to adhere to the established mitigation hierarchy, which in turn hampers the competent authority's ability to evaluate whether less harmful and more suitable alternatives are available. Without a thorough assessment of alternatives, it cannot be concluded that the proposal is a sustainable or compliant solution within policy frameworks.

From a policy standpoint, this inadequacy compromises compliance with National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a material omission that contributes to the overarching conclusion that the application has not been sufficiently evaluated and is not capable of supporting a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to adequately identify or assess protected species. This deficiency introduces a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these circumstances, consent cannot be lawfully granted.

The assessment of marine ecology and protected species is significantly flawed and fails to provide a comprehensive understanding of the ecological receptors in the West Lewis coastal environment, which is a biologically active and sensitive marine system. The methodologies employed are insufficient, resulting in incomplete baseline data that does not reliably capture the presence, behaviour, and habitat use of various species. Consequently, the evidential basis for evaluating potential impacts is weak.

A significant oversight pertains to otters, classified as a European Protected Species, with the application not adequately recognising their active utilisation of coastal areas for foraging and movement. The neglect of their core foraging range and behavioural patterns results in an insufficient assessment of the potential impacts of construction disturbance, noise, and increased activity, undermining any conclusions regarding the absence of significant effects on this species.

Moreover, there are notable shortcomings in the assessment of basking sharks, particularly due to the reliance on aerial surveys, which introduce considerable detection bias, especially under Atlantic conditions. This methodology is likely to lead to an underestimation of the sharks' presence, particularly when compared to established land-based observations that indicate frequent utilisation of these waters. The failure to properly consider such data contributes to an incomplete baseline, further diminishing the reliability of the presented conclusions.

These methodological shortcomings imply that conclusions of negligible or non-significant effects are derived from assumptions rather than sound evidence. The lack of adequate baseline data also inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, creating ambiguity about the actual level of risk posed to marine species and habitats.

In summary, the combined issues of incomplete baseline data, inadequate methodologies, and unfounded conclusions result in an unreliable assessment. These shortcomings hinder a thorough evaluation of the impacts on marine ecology and protected species, ultimately demonstrating that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment conducted lacks reliability due to significant internal inconsistencies and methodological weaknesses, which result in a failure to provide adequate evidence. The application does not meet the evidential threshold required to demonstrate that the integrity of protected sites will remain unaffected. Notably, the assessment fails to robustly evaluate the implications of displacement, collision risk, or habitat loss within key foraging areas and migratory pathways located on the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline.

There exists a fundamental contradiction in the application. The developer asserts that

no significant adverse effects will occur while simultaneously proposing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment and the validity of its conclusions, which are not substantiated by the evidence presented.

Furthermore, the assessment does not sufficiently account for the importance of feeding grounds associated with protected sites, such as the Lewis Peatlands and St Kilda. The reliance on modelling approaches creates uncertainty, particularly for species experiencing severe decline, including Kittiwakes and Fulmars. The methodologies employed may underestimate mortality rates, especially where baseline data is lacking and behavioural responses remain inadequately understood.

The placement of turbines within a recognised migratory corridor introduces a notable risk, as it effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor are not adequately addressed in the application, nor are the potential effects on species with relatively small global populations considered.

In light of these deficiencies, the application stands in direct conflict with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not face adverse effects undermines compliance with national policy.

Collectively, these factors contribute to the conclusion that the assessment does not fulfil the statutory requirements necessary to support a determination. The standard of beyond reasonable scientific doubt has not been achieved, thereby engaging the precautionary principle and precluding a lawful conclusion in favour of consent.

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 evaluation of social impacts, health, and wellbeing lacks the necessary transparency for a lawful assessment. While a Social Impact Assessment was commissioned by the developer, including focus groups with local residents, the complete report has not been made available. This absence of information creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full extent of social risks identified in the developer's research.

Residents are reportedly experiencing stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement and are not mere speculation. However, the failure to disclose the complete assessment prevents thorough scrutiny of these findings, limiting the capacity to evaluate their significance in the decision-making process.

Furthermore, the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this recognition, such impacts have not been sufficiently integrated into the application or given adequate consideration. The withholding of the full Social Impact Assessment obscures the true social and human costs associated with the development.

This lack of transparency compromises the Environmental Impact Assessment process. Understanding social, economic, and health impacts is crucial for developments of this scale, particularly those that may affect community character and functioning. Without the complete dataset, the application does not provide a comprehensive evidential basis for weighing benefits against harm.

From a policy standpoint, the application fails to align with National Planning Framework 4 regarding health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm, yet the available evidence suggests existing adverse effects that have not been fully revealed. Without the full assessment, compliance with this policy cannot be verified.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This constitutes a material omission within the application and a failure to satisfy the evidential standards of the Environmental Impact Assessment framework.

In conclusion, the non-disclosure of the complete Social Impact Assessment, alongside evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This hinders a lawful determination and confirms that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application for large-scale turbines near the West Lewis coastline raises serious concerns about the assessment of seascape, landscape, and visual impacts. The coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a strong sense of remoteness. The introduction of these turbines would create a dominant industrial presence, fundamentally changing the landscape and leading to a permanent transformation.

The assessment of visual change is insufficient. The scale and closeness of the turbines would dominate views from residential areas, historic sites, and popular coastal spots. This would directly impact visual amenity and diminish the qualities of naturalness and remoteness. Furthermore, the assessment does not adequately communicate the significance of these impacts, particularly in relation to the sensitive nature of the landscape.

Methodological issues have also been identified regarding the selection and presentation of visual viewpoints. There is evidence suggesting that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially concerning important cultural heritage sites and valued landscapes. This risk of underestimating visual impact raises questions about the assessment's reliability.

Another significant concern is the lack of consideration for the interconnectedness of landscape, seascape, and cultural heritage. Key sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape that visually and spatially connects to the Atlantic horizon. Treating these assets as isolated overlooks their interdependence and leads to an incomplete understanding of how the proposed development would affect their context and cultural importance.

The potential industrialisation of the seascape threatens to sever these connections, altering how heritage assets are perceived and disrupting their relationship with the natural horizon. This represents a deeper cultural and spatial harm that the application fails to adequately address.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly regarding the protection of natural spaces and historic assets. The extent of the proposed changes 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 diminishes any claim of compliance with policy.

It is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would create an unavoidable dominance. Therefore, the resulting changes are fundamental and permanent, not reducible to acceptable levels through mitigation efforts.

Overall, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation, reinforcing the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

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

There is considerable uncertainty regarding the scale and behaviour of sediment

plumes generated by seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also encompasses potential effects on marine species and habitats that are already recognised as sensitive within the wider assessment.

Moreover, the absence of detailed emergency response procedures intensifies these issues. By postponing contingency planning until after consent, the application fails to allow for evaluation of whether adequate safeguards are in place to address pollution incidents. This approach not only introduces procedural risk but also undermines the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements outlined by the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to consent, and without this information, a lawful determination cannot be achieved. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The evaluation of fisheries and marine life within the application is notably inadequate, lacking a thorough assessment of ecological and socio-economic repercussions. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry, yet the proposal fails to illustrate how these vital habitats and uses will be preserved or sustained without incurring significant disruption.

A major concern is the erroneous assumption that fishing activities can be relocated without repercussions. The application does not provide any evidence that alternative fishing grounds exist, are accessible, or can accommodate additional pressure. This significant gap raises the risk of overfishing in other areas and could have far-reaching economic impacts on the local fishing fleet. In the absence of a clear, evidence-based evaluation, the effects on fisheries and community livelihoods remain obscured.

Furthermore, the project poses considerable risks to marine species, particularly due to the underwater noise associated with construction activities. The extended use of high-energy hammer piling is anticipated to cause disturbance over considerable distances, impacting marine life such as dolphins. The projected disturbance to a considerable portion of the local bottlenose dolphin population is alarming, yet the application minimises these concerns without adequate supporting data.

There is a troubling inconsistency in the application regarding the recognition of the need for licences to permit harm to European Protected Species, while simultaneously categorising the impacts as negligible. This contradiction calls into question the credibility of the assessment and raises significant issues concerning adherence to the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Moreover, the assessment neglects to account for cumulative impacts that arise from various pressures, including habitat disturbance, noise, and fishing displacement. 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 the National Planning Framework 4 or the National Marine Plan. It does not adequately show that the proposed development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, thereby obstructing any conclusion that the project constitutes sustainable development.

In summary, the deficiencies stemming from the lack of evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and untrustworthy. These shortcomings significantly impede a comprehensive evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The examination of onshore infrastructure is significantly lacking and does not adequately account for the comprehensive impacts stemming from what constitutes a singular, integrated project. The connection between offshore turbines and onshore works is critical, yet these elements are evaluated in isolation. This fragmented assessment clouds the true magnitude of the environmental and socio-economic ramifications.

Onshore activities encompass cabling that traverses protected moorland, the construction of a substation near Stornoway, and the development of access routes through delicate landscapes. These undertakings necessitate excavation in areas of deep peat, particularly within Barvas Moor, which is not only a vital carbon sink but also an ecologically sensitive area. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

The omission or postponement of onshore impact evaluations obstructs an accurate appraisal of cumulative effects. The Environmental Impact Assessment process mandates that all facets of a project be considered in conjunction. However, the distinct treatment of offshore and onshore components obscures the collective impacts on peatlands, habitats, and local communities, leaving these critical aspects

inadequately understood.

Moreover, there are significant threats to vulnerable habitats, such as machair systems and peatland environments, which hold policy protection. The application does not convincingly demonstrate that the consequences for these habitats have been thoroughly evaluated or that suitable avoidance strategies have been enacted. This results in a notable evidential void concerning biodiversity preservation.

Concerns regarding carbon balance are also prominent. Disturbance of peatland results in the release of stored carbon, which may instigate a carbon debt, undermining the very objectives of renewable energy initiatives. The application lacks sufficient analysis of this matter or fails to show that the overall carbon balance is favourable.

Additionally, the routing of infrastructure through active croft land creates potential conflicts with current land use and legal rights. There is no evidence provided that the requisite consents or procedures have been initiated, leading to doubts about the feasibility and lawful execution of the proposal.

From a policy standpoint, the failure to evaluate the project in its entirety and to demonstrate safeguarding of peatlands, habitats, and land use concerns is at odds with the National Marine Plan and National Planning Framework 4. The inability to prove that adverse impacts can be avoided or mitigated further diminishes the application's credibility.

Ultimately, the disjointed treatment of project components, the lack of a thorough assessment, and insufficient evidence regarding environmental and land use impacts render this portion of the application incomplete and unreliable, inhibiting a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of any assessment of dark skies and nocturnal wildlife within the Environmental Impact Assessment represents a critical shortfall. The West Lewis coastline, known for its exceptionally dark skies, is integral to the area's environmental quality, cultural identity, and tourism value. However, the proposal includes permanent red aviation lighting that will be visible over long distances, resulting in a continuous and intrusive “wall of light” effect across the western horizon, thereby fundamentally altering the night-time environment.

The application fails to consider the impacts of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly significant given the importance of dark skies to the area's identity and the emerging sectors in tourism, such as astro-tourism. Consequently, there exists a significant gap in the overall landscape and environmental assessment.

Moreover, there has been no evaluation of the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are especially

sensitive to artificial lighting, as it can lead to disorientation and increased collision risks. The application lacks a lighting impact assessment or a phototaxis study, failing to evaluate the potential effects of aviation lighting on these species or the potential for increased mortality.

This lack of assessment is aggravated by the dependence on daytime survey data in the ornithological assessment, which does not adequately capture nocturnal activity or associated risks. Kittiwakes, for example, may forage or migrate at night and could also be disoriented by artificial lighting; yet this risk has gone unassessed. Without site-specific night-time data, there remains a critical gap in understanding the ecological impacts.

In the absence of an evaluation of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard 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 conflict with National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. They also undermine the comprehensive assessment of landscape and seascape impacts, as the night-time character is an essential aspect of the environment.

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

TOURISM

The application acknowledges that a substantial 86% of visitors are attracted to the Isle of Lewis due to its stunning scenery, yet it lacks a detailed assessment of how large-scale offshore infrastructure could influence visitor numbers and overall economic contributions. Tourism is intrinsically linked to the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness, which all play a critical role in the visitor experience. The absence of a thorough analysis raises serious concerns about the potential economic and social repercussions for this vital sector.

Tourism on the Isle of Lewis has experienced remarkable growth, rising from £65 million in 2017 to over £81.5 million, supporting over 1,000 jobs and representing up to 16% of the island's economy. However, the application fails to model the implications of the industrialisation of the seascape and the consequent loss of environmental quality on Tourism Gross Value Added and overall economic resilience. Without this crucial analysis, it remains unclear whether the proposed development would result in a net economic benefit or jeopardise an already thriving sector.

Moreover, the importance of environmental quality in sustaining tourism has been

overlooked. The significance of unspoiled landscapes and dark skies cannot be underestimated, particularly regarding emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, creating a substantial gap in understanding the impacts on this growing facet of the local economy.

Given the limited economic diversification of this island community, neglecting the impacts on tourism carries broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly evaluated, as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate adherence to the National Planning Framework 4, especially regarding economic impact and the necessity to provide evidence of net benefit. It also contradicts strategic objectives that highlight tourism as a priority growth sector and lacks sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

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

SUMMARY

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

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

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

resilience, thereby making the application unsuitable for determination.

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

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

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

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

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

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: C0F54ED8

Member of the public 954

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment regimes. My concerns stem from a thorough review of the Environmental Impact Assessment Report and its supporting documents, revealing significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The proposed development is to be situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. The scale, proximity, and design of this proposal raise serious questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application is deficient in providing a solid evidential foundation for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Many essential aspects of the proposal remain undefined. The flexible design framework employed complicates an accurate assessment of likely significant effects, while the reliance on unspecified mitigation measures prevents an evaluation of their effectiveness. Consequently, the documentation does not afford a comprehensive understanding of the potential environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects lack robust evidence to support them.

There are significant 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, particularly concerning biodiversity, natural habitats, cultural heritage, and overall health and wellbeing. It does not adequately demonstrate compliance with national standards aimed at safeguarding biodiversity, climate objectives, and environmental integrity. Such conflicts directly affect the statutory tests necessary for granting consent and impair the competent authority's ability to conclude that the development aligns with policy requirements.

The unprecedented scale of this proposal, with large turbines positioned dangerously close to the shoreline, raises major concerns about landscape capacity, visual dominance, and environmental repercussions. Together, the lack of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these factors, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and fails to deliver a clear, transparent, and dependable account of the potential environmental impacts of the proposal. The proposal's use of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for the turbines, creates significant uncertainty. This ambiguity hinders the ability to apply a worst-case scenario consistently and jeopardises the integrity of the assessment. Consequently, the impacts outlined may not accurately represent what will ultimately be constructed, preventing both the public and the relevant authorities from fully understanding the extent of the environmental effects.

The application is heavily reliant on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that environmental harm will be addressed after approval restricts any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. This deferment of crucial information to post-consent stages is procedurally unacceptable and contradicts the intentions of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies should be clearly established prior to any determination.

There are notable evidential shortcomings, including insufficient baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of the impacts, particularly in cases where the report concludes negligible or non-significant effects without robust supporting evidence. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, thereby introducing a level of scientific uncertainty that conflicts with statutory obligations.

As a result, the application does not meet the evidential standards required under the Habitats Regulations 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 demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it remains unclear whether the impacts have been thoroughly assessed or if appropriate safeguards exist.

In summary, the combination of an undefined design envelope, lack 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 thorough assessment of environmental effects, placing the competent authority in a position where it cannot make a well-informed decision based on the information available.

ASSESSMENT OF ALTERNATIVES

The application fails to meet the statutory requirements of the Environmental Impact Assessment regime due to an inadequately conducted assessment of alternatives. It does not provide a structured and reasoned comparison of realistic alternatives based

on their environmental effects, instead offering a narrative of project evolution. This methodology does not demonstrate that less harmful options have been appropriately identified, assessed, and selected over more damaging alternatives.

In particular, there is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. The application does not prove that the developer has seriously explored the potential for turbine placement further offshore, which could likely mitigate visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the critical nature of proximity to shore in assessing impact underline the significance of this omission; without such analysis, it cannot be concluded that the proposed siting is the least damaging option available.

The deficiencies are further evident in the assessment of cable routing and landfall. The application lacks sufficient evidence that alternative routes have been thoroughly investigated to avoid or minimise effects on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The absence of a clear avoidance strategy and the failure to conduct a comparative analysis suggest that mitigation by design has not been utilised, resulting in a reliance on post-design measures for mitigation.

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

From a policy standpoint, this deficiency compromises compliance with National Planning Framework 4, specifically in relation to the protection of natural spaces, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a material omission, reinforcing the conclusion that the application has not been adequately evaluated, thereby hindering a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

A crucial oversight in the application is the treatment of otters, a European Protected Species. The active use of coastal areas by otters for foraging and movement has not

been recognised or properly assessed. This disregard for their core foraging range and behavioural patterns means that the possible effects of construction disturbances, noise, and increased activity have not been thoroughly evaluated. This gap undermines any conclusions regarding the absence of significant effects on the species.

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

The methodological shortcomings lead to findings of negligible or non-significant effects being based on assumptions rather than on sound evidence. The lack of adequate baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the genuine level of risk posed to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposal is fundamentally flawed, exhibiting substantial gaps in evidence and inconsistencies that undermine its conclusions. Key foraging areas and migratory pathways, particularly along the west coast of the Isle of Lewis, support internationally important seabird populations, many of which are already experiencing declines. However, the application fails to demonstrate, to the necessary evidential standard, that these species will not be adversely affected by the development. The implications of displacement, collision risk, and habitat loss have not been robustly evaluated.

There exists a significant contradiction within the application. The developer concludes that there are no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment

and suggests that the conclusions drawn are not substantiated by the evidence presented.

Moreover, the assessment does not sufficiently demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is inadequately considered, and reliance on modelling approaches introduces uncertainty, especially for species in severe decline like Kittiwakes and Fulmars. The methodologies utilised are likely to underestimate mortality rates, particularly given the incomplete baseline data and a lack of comprehensive understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor presents additional significant risks, effectively creating a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not thoroughly assess the long-term implications of sustained mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application fails to meet the evidential threshold necessary to assert no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle, which precludes a lawful conclusion that would support consent.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual and landscape impacts associated with the proposed turbines is significantly inadequate, failing to accurately capture the scale of change and the sensitivity of the West Lewis coastline. This area is characterised by its unspoilt Atlantic horizon, natural landscape, and a profound sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would introduce a pervasive industrial presence that would fundamentally change this character, leading to an irreversible transformation of the landscape.

The application does not effectively represent the extent of the visual changes anticipated. The size and proximity of the turbines would dominate views from

residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and undermining the defining qualities of naturalness and remoteness. The assessment inadequately conveys the significance of these impacts in the context of such a sensitive landscape.

Moreover, there are serious methodological issues concerning the selection and presentation of visual viewpoints. It appears that the chosen viewpoints do not adequately represent the most sensitive receptors or the worst-case scenarios, particularly regarding cultural heritage sites and high-value landscapes. This raises concerns that the magnitude of visual impact has been understated, thereby compromising the assessment's reliability.

Another critical oversight is the lack of consideration for the interconnectedness of landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are integral to a wider landscape that is visually and spatially linked to the Atlantic horizon. The assessment treats these heritage assets in isolation, disregarding their interdependence, which results in a partial evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever these important relationships, altering how heritage assets are perceived and disrupting their connection to the natural horizon. This not only represents a visual issue but also inflicts broader cultural and spatial damage, which has not been sufficiently evaluated in the application.

From a policy standpoint, this proposal contravenes the National Planning Framework 4, particularly regarding the protection of natural landscapes and historic assets. The extent of the proposed changes is inconsistent with the requirement to preserve landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a thorough worst-case assessment further diminishes any claims of compliance with policy guidelines.

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

In summary, the assessment fails to accurately portray the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and strongly indicate that the proposal is incompatible with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application presents significant deficiencies regarding the assessment of construction and pollution risks, which ultimately impedes a thorough evaluation of

potential environmental effects. It involves considerable seabed preparation and installation activities in a high-energy Atlantic setting. However, it lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be formulated after consent, making it impossible to assess their adequacy or effectiveness.

Moreover, the reliance on undefined future measures raises considerable concerns due to the vulnerability of the receiving environment. The West Lewis coastline is characterised by clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it does not provide adequate information on how these risks will be prevented, controlled, or monitored.

Further complicating the situation is the uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of rigorous modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological implications of these impacts. This uncertainty is relevant to the potential effects on marine species and habitats that have already been identified as sensitive within the broader assessment framework.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent stage, the application hampers the ability to evaluate whether appropriate safeguards exist to address pollution incidents. This introduces procedural risks and undermines the competent authority's capacity to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contravenes the stipulations of the Environmental Impact Assessment regime. It is mandated that likely significant effects and mitigation must be evaluated prior to granting consent, and the absence of such information renders lawful determination unfeasible. Furthermore, the application fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the combination of undefined mitigation measures, insufficient management plans, and uncertainties surrounding potential impacts leads to a materially deficient assessment. 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 lacks a robust evaluation of the ecological and socio-economic impacts on fisheries and marine life. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the

proposal fails to adequately demonstrate how these habitats and activities can be protected or maintained without significant disruption.

One major concern is the assumption that fishing activities can be displaced without negative consequences. The application does not provide evidence that alternative fishing grounds are available, accessible, or capable of supporting any additional pressure. This is a critical omission, as such displacement poses a risk of overfishing in other areas and could have broader economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and the livelihoods dependent on them remain unclear.

The proposal also poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is likely to cause significant disturbance over large distances, affecting species such as dolphins. The anticipated disturbance to a considerable portion of the local bottlenose dolphin population is particularly concerning, yet the application appears to downplay the significance of these effects without adequate supporting evidence.

There is a notable inconsistency in the application regarding the need for licences to permit harm to European Protected Species, acknowledged while simultaneously claiming the impacts are negligible. This contradiction raises doubts about the credibility of the assessment and raises issues of compliance with the Habitats Regulations, especially where harm is anticipated to the extent that legal authorisation would be necessary.

Moreover, the assessment does not 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 is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is fundamentally flawed due to the total absence of any evaluation concerning dark skies and nocturnal wildlife. The West Lewis

coastline is known for its exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism, particularly as it relates to astro-tourism. The proposal seeks to install permanent red aviation lighting that will be visible from great distances, creating a disruptive “wall of light” across the western horizon and altering the night-time environment considerably.

There has been no consideration of how this lighting will impact visual amenity, landscape character, or the experiences of both residents and visitors. This lack of assessment is critical, given the significance of dark skies to the area’s identity and its potential to attract tourism. The failure to address these implications results in a substantial gap in the overall landscape and environmental evaluation.

Moreover, the application neglects to evaluate the effects on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly affected by artificial lighting due to their phototactic behaviour, leading to disorientation and a heightened risk of collisions. The application lacks any form of lighting impact assessment or phototaxis study, thereby failing to investigate how the proposed aviation lighting might impact these species or contribute to increased mortality rates.

This issue is exacerbated by the use of daytime survey data in the ornithological assessment, which fails to account for nocturnal behaviours or associated dangers. Species like Kittiwakes, which may engage in foraging or migration at night, are also at risk of disorientation from artificial light, yet this has not been evaluated. The absence of night-time data specific to the site creates a crucial gap in understanding the potential ecological impacts.

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

From a policy standpoint, this omission contravenes National Planning Framework 4, which pertains to the safeguarding of natural places and environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the character of the night-time environment is an essential aspect of the ecosystem.

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

TOURISM

The 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 proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the criteria for sustainable development as defined by statutory obligations, national policy, and evidential requirements. The issues central to this application echo those that led to the 2008 rejection of the Lewis Wind Power proposal, where the degree of industrialisation was deemed unacceptable. This current proposal is presented under a more robust policy framework that emphasises biodiversity, peatland conservation, landscape integrity, and community wellbeing.

The application is lacking a complete and reliable evidential basis for decision-making. There are notable deficiencies in baseline data, the continued utilisation of an undefined design envelope, and an overreliance on unspecified mitigation measures. Moreover, it fails to address key impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and potential tourism effects. Consequently, the Environmental Impact Assessment is insufficient and does not facilitate a thorough understanding of significant effects or residual impacts.

Procedural inadequacies are also evident. The absence of a compliant Island Communities Impact Assessment is a violation of the statutory duties mandated by the Islands (Scotland) Act 2018, and the non-disclosure of a complete Social Impact Assessment constitutes a critical omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Additionally, the proposal stands in direct opposition to the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural areas, and cultural heritage, nor does it prove that impacts on health and wellbeing are acceptable. Furthermore, it 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 sufficiently assessed, leaving the implications for peatlands, carbon balance, habitats, and crofting land unclear.

There are considerable uncertainties regarding environmental risks that may be significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in certain areas. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and preventing a lawful conclusion that impacts are acceptable.

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

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

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

Additional Comments

This proposal will have a detrimental impact on my business providing tourism and income to the island. We provide employment and also purchase goods from local producers in the island as much as possible.
The position of this wind farm so close to the island is coastline it has no consideration for those living on the island. The reasons given at public consultation was that it was where the government /license permit had allocated and they could do nothing about it. This is a weak excuse and should be reconsidered and repositioned like every other wind farm in the uk at a distance it can not be seen from the coastline.
This will impact this island for many years and will likely impact on further decline of the population as a result.

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: E959CDC4

Member of the public 955

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the marine licensing and Environmental Impact Assessment regimes. The concerns raised stem from a thorough examination of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. Situated off the west side of the Isle of Lewis, the proposed development exists in an area characterised by its Atlantic-facing coastline, near-pristine natural environment, and a strong cultural identity.

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

Moreover, the proposal presents clear and substantive conflicts with policy. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national requirements intended to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests needed for consent and undermine the authority's ability to determine the proposal's acceptability in policy terms.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is unreliable and incomplete. It lacks a full and transparent account of the potential environmental effects of the proposal. The approach of using a flexible Project Design Envelope creates significant uncertainty.

Without specific details on turbine dimensions, layouts, or configurations, it is impossible to apply a consistent worst-case scenario. This undermines the integrity of the assessment, meaning that the impacts shown may not truly represent the final development. Consequently, both the public and the competent authority cannot grasp the full extent of the environmental effects.

The application depends on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent based on the assumption that environmental harm will be addressed later inhibits any meaningful evaluation of these measures' effectiveness or an assessment of residual impacts. This postponement of crucial information to stages following consent is procedurally unacceptable. It contradicts the aims of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation strategies are established clearly before any determination.

Additionally, there are considerable gaps in baseline data, shortcomings in methodology, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty about the scale and significance of the impacts, especially where conclusions about negligible or non-significant effects are made without solid supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot meet statutory requirements.

As a result, the application does not satisfy the evidential threshold mandated by the Habitats Regulations, which requires excluding adverse effects beyond reasonable scientific doubt. This situation calls for the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that adequate safeguards are in place.

In summary, the reliance on an undefined design envelope, the lack of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report insufficient and lacking in reliability. These deficiencies hinder a lawful and robust assessment of environmental effects and leave the competent authority unable to determine the application 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 application demonstrates significant deficiencies in the assessment of marine ecology and protected species, particularly concerning its understanding of ecological receptors in the sensitive and biologically active environment of West Lewis coastal waters. The methodologies employed are inadequate, leading to an incomplete baseline that fails to capture crucial details such as species presence, behaviour, and habitat use.

Notably, the assessment neglects to properly recognise otters, a European Protected Species, in their active utilisation of coastal areas for foraging and movement. This oversight extends to an inadequate consideration of their core foraging range and behavioural patterns, resulting in an insufficient evaluation of potential impacts from construction disturbances, noise, and increased human activity. Consequently, the assessment's conclusions regarding the absence of significant effects on otters lack a

solid evidential basis.

Further issues arise in the evaluation of basking sharks, where the reliance on aerial surveys leads to a substantial detection bias, particularly in the challenging conditions of the Atlantic. This method is prone to underestimating the presence of basking sharks when juxtaposed with well-documented land-based observations that demonstrate their frequent use of these waters. The failure to adequately incorporate or consider such pertinent data results in an incomplete baseline and undermines the validity of the conclusions drawn.

These methodological shortcomings result in determinations of negligible or non-significant effects that rely more on assumptions than on robust evidence. Additionally, the lack of comprehensive baseline data hinders meaningful assessments of cumulative and indirect impacts, including variations due to seasonal changes and broader ecosystem interactions. This uncertainty raises concerns about the true risks faced by marine species and their habitats.

From a regulatory standpoint, the application does not align with the stipulations of the Environmental Impact Assessment regime and the National Planning Framework 4, as there has been an inadequate identification and assessment of protected species. The uncertainty introduced by these deficiencies prevents the exclusion of potential adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Thus, the issuance of consent cannot be justified within the legal framework.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions collectively renders the assessment unreliable. These shortcomings impede a thorough evaluation of impacts on marine ecology and protected species, ultimately leading to the conclusion that the application is unsupported by a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant shortcomings, characterised by internal inconsistencies and gaps in evidence that undermine its findings. The application does not sufficiently demonstrate that the internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, will remain unaffected by the proposed development. Key foraging areas and migratory pathways are situated within the development site, yet there is inadequate evaluation of the potential implications related to displacement, collision risk, or habitat loss.

A notable contradiction arises within the application, as the developer asserts that there will be no significant adverse effects, while also proposing a Habitats Regulations derogation case, which is typically necessitated only when significant harm is anticipated. This inconsistency raises questions about the credibility of the assessment and suggests that the conclusions drawn lack support from reliable evidence. Furthermore, the assessment does not sufficiently address the potential impacts on

seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not thoroughly examined, and the reliance on modelling techniques introduces uncertainty, particularly for species like Kittiwakes and Fulmars, which are experiencing severe declines. The methodologies employed may likely underestimate mortality, especially given the incomplete baseline data and limited understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional significant risk, essentially creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor and the potential effects on species with relatively small global populations have not been adequately assessed. From a regulatory standpoint, the application falls short of meeting the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with gaps in data and limitations in modelling, indicates that the assessment does not achieve the standard of proof beyond reasonable scientific doubt. This situation engages the precautionary principle, resulting in an unlawful conclusion regarding consent.

In addition, the identified deficiencies represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct contradiction with national policy. Collectively, these factors contribute to the assessment being unreliable, primarily due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. Consequently, these shortcomings hinder a thorough evaluation of impacts and lead to the overall conclusion that the application fails to meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

There is a notable shortfall in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are characterised. These sites are active burial grounds and places of spiritual significance, but the assessment simplistically categorises them as unchanging features. This failure to recognise their ongoing use and meaning, along with the potential impact of the development on their surroundings, leads to an incomplete understanding of the cultural ramifications and overlooks their significance in community life.

Moreover, the assessment neglects to address intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community

and the coastal environment. These elements are crucial to the area's identity but are entirely omitted from the evaluation, representing a serious oversight. Understanding the cultural impact of the development is impossible without these considerations.

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

Significantly, the application does not sufficiently illustrate the extent of this visual change. The sheer scale and proximity of the turbines would overpower views from residential areas, historic landmarks, and popular coastal spots, directly diminishing visual amenity and compromising the area's intrinsic qualities of naturalness and remoteness. The assessment inadequately conveys the magnitude of this impact, which is especially concerning given the delicate nature of the landscape involved.

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

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

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

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

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

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

FISHERIES AND MARINE LIFE

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

A notable flaw is the assumption that fishing activities can be displaced without repercussions. The application fails to demonstrate the availability or accessibility of alternative fishing grounds that could handle any additional pressures resulting from displacement. This lack of evidence is critical as it opens the door to potential overfishing in other areas, posing economic risks for the local fishing fleet. The impacts on livelihoods and fisheries remain inadequately understood due to the absence of a clear, evidence-based evaluation.

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The onshore works associated with the project, including cabling across protected moorland and the construction of a substation near Stornoway, introduce significant risks to sensitive habitats. The proposed access infrastructure runs through landscapes that are ecologically fragile, particularly involving excavation across deep peat areas, notably within Barvas Moor, which serves as a crucial carbon store and sensitive habitat. The application fails to provide a comprehensive assessment of these impacts, which hinders a full understanding of the project's environmental footprint.

The risks extend to the machair systems and peatland environments, which are protected under existing policy. The application does not demonstrate that the impacts on these habitats have been thoroughly evaluated, nor does it show that appropriate avoidance measures have been implemented. This represents a substantial evidential gap concerning biodiversity protection.

Moreover, the assessment of onshore infrastructure is materially incomplete as it considers the offshore turbines and onshore works separately. This fragmented approach obscures the true scale of the environmental and socio-economic effects, preventing a proper evaluation of cumulative impacts. The Environmental Impact Assessment process mandates that all components of a project be assessed together; however, the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not adequately understood.

The disturbance of peatland associated with these works raises serious concerns about carbon balance. The release of stored carbon could lead to a carbon debt that undermines the very objectives of renewable energy development. Yet the application does not sufficiently address this issue or demonstrate that the overall carbon balance remains positive.

Additionally, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is a lack of evidence that the necessary consents or processes have been initiated, which brings into question the deliverability and lawful implementation of the project.

From a policy standpoint, the failure to assess the project holistically and to demonstrate protection for peatlands, habitats, and land use interests is at odds with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application. Consequently, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts render this part of the application incomplete and unreliable, preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife is a significant shortcoming in the Environmental Impact Assessment. 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 proposal introduces permanent red aviation lighting that will be visible over extensive distances, creating a continuous "wall of light" effect across the western horizon. This alteration will fundamentally disrupt the night-time environment.

Furthermore, the application does not evaluate how this lighting will impact visual amenity, landscape character, or the experiences of both residents and visitors. This omission is particularly concerning given the crucial role that dark skies play in the area's identity and in burgeoning sectors like astro-tourism. The failure to consider these impacts leaves a notable gap in the landscape and environmental assessment.

More alarmingly, there is no analysis of the effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly vulnerable to artificial lighting due to their phototactic behaviour, leading to disorientation and a higher risk of collision. The application lacks any lighting impact

assessment or phototaxis study, resulting in an oversight of how the proposed aviation lighting may affect these species and potentially increase mortality rates.

Compounding this issue is the reliance on daytime survey data within the ornithological assessment, which fails to capture the nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate at night, also face the threat of disorientation from artificial lighting, yet this has not been properly assessed. The absence of site-specific night-time data creates a critical void in understanding the ecological impacts.

Without a thorough assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites may suffer adverse effects. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt is not met, necessitating the application of the precautionary principle and obstructing 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 diminishes the overall evaluation of landscape and seascape impacts, as the character of the night-time environment is an integral component of the surroundings.

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

TOURISM

The assessment of tourism impacts is significantly lacking and does not evaluate the economic and social consequences for a crucial sector of the Isle of Lewis economy. Tourism is inherently reliant on the wild coastline, near-pristine landscape, dark skies, and sense of remoteness that the area offers. The application notes that 86% of visitors are attracted by 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 of tourism.

Tourism has seen substantial growth, increasing from £65 million in 2017 to over £81.5 million, and supports more than 1,000 jobs while accounting for up to 16% of the island's economy. Yet, the application does not model the potential effects of industrialising the seascape and the resulting loss of environmental quality on Tourism Gross Value Added or the broader economic resilience of the area. Without such analysis, it remains unclear whether the development would produce a net economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment overlooks the crucial role of environmental quality in tourism, specifically the significance of unspoiled landscapes and dark skies for visitor experience and emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, leaving a

substantial gap in understanding the impacts on a recognised and 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. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been examined as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application 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 recognise tourism as a priority growth sector and fails to provide adequate evidence for the competent authority to evaluate the economic consequences of the proposal.

Collectively, the failure to quantify tourism impacts, assess environmental factors that drive visitor behaviour, and consider the island's economic dependency leads to a significant evidential gap. This hampers a robust evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. This proposal echoes the central issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. It is now put forward under a policy framework that places heightened emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis provided in the application is both incomplete and unreliable. There are significant gaps in baseline data, the design envelope remains undefined, and there is a reliance on unspecified mitigation measures. Furthermore, important impact pathways are omitted, such as those affecting nocturnal wildlife, the full extent of onshore infrastructure, and the implications for tourism. As a result, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects or residual impacts.

Procedural failings are also evident. The lack of a compliant Island Communities Impact Assessment represents a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment constitutes a notable omission. These shortcomings impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In addition, the proposal contradicts the principles laid out in National Planning Framework 4. It does not sufficiently demonstrate the protection of biodiversity, natural

spaces, and cultural heritage, fails to show that health and wellbeing impacts are acceptable, and cannot evidence a net economic benefit due to the lack of tourism impact modelling. The cumulative impact of both offshore and onshore elements has not been adequately assessed, masking effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with the proposal remain uncertain and potentially significant. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistently documented. The requisite evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which engages the precautionary principle and prevents a lawful conclusion that the impacts are acceptable.

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

Taken as a whole, the application is procedurally and substantively inadequate for determination. The numerous information deficiencies, coupled with policy conflicts and unresolved environmental risks, hinder a lawful and evidence-based decision. The competent authority should refuse consent on these grounds or utilise the relevant regulatory provisions to mandate the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 19F3777B

Member of the public 956

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted for marine licensing and Environmental Impact Assessment. A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals significant deficiencies across planning, environmental, cultural, and procedural aspects. This development is proposed off the west side of the Isle of Lewis, an area that boasts an Atlantic-facing coastline, a near-pristine environment, and a strong cultural heritage. The proposal's scale, design, and proximity to the shoreline raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential foundation for a lawful determination. There is a notable absence of critical environmental data, with baseline information being both limited and inconsistent. Furthermore, essential components of the proposal remain unspecified. The reliance on a flexible design framework obscures potential significant effects, and the undefined mitigation measures prevent any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the impacts on the environment, culture, and community, leaving the claims of negligible or non-significant effects unsubstantiated by adequate evidence.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development fails to provide a comprehensive and reliable assessment of marine ecology and protected species within the West Lewis coastal environment.

This area is recognised for its biological activity and sensitivity, yet the baseline data remains incomplete, and the methodologies used do not adequately account for species presence, behaviour, and habitat use. Consequently, the assessment lacks a sound evidential basis for evaluating potential impacts.

A significant shortcoming is found in the consideration of otters, which are a European Protected Species. The application does not sufficiently recognise or assess their active use of coastal areas for foraging and movement. By neglecting to evaluate their core foraging range and behavioural patterns, the assessment overlooks the potential effects of construction disturbances, noise, and increased activity, ultimately undermining the conclusions drawn regarding the absence of significant impacts on this species.

Further shortcomings are evident in the assessment of basking sharks. The reliance on aerial surveys introduces substantial detection bias, particularly in challenging Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent use of the waters in question. The failure to include or adequately consider such data results in an incomplete understanding of the baseline, which in turn diminishes the reliability of the conclusions reached.

These methodological weaknesses mean that the determination of negligible or non-significant effects relies on assumptions rather than solid evidence. Additionally, the lack of sufficient baseline data hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns regarding the true extent of risks posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime or 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, necessitating the application of the precautionary principle. In such circumstances, granting consent cannot be justified.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The current assessment of cultural heritage and community identity is deeply flawed, neglecting the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are interlinked. Rather than recognising these elements as part of an ongoing cultural narrative, the application

reduces heritage to isolated and static assets, overlooking their vital social, cultural, and spiritual roles within the community.

A significant shortcoming lies in the treatment of culturally important locations such as the cemeteries at Dalmore, Bragar, and Barvas. These sites remain active for burial and spiritual practice, yet the assessment inaccurately presents them as static features, disregarding their current use, significance, and how the proposed development could affect their surroundings. This misinterpretation leads to an incomplete understanding of cultural implications, failing to acknowledge their integral role in community life.

The omission of intangible cultural heritage is another critical issue. Factors such as the Gaelic language, local traditions, and the longstanding bond between the community and the coastal environment are essential to the area's identity but are entirely overlooked in the assessment. The absence of these considerations obstructs a comprehensive understanding of the cultural impact of the proposed development.

Moreover, concerns about community rights and involvement are evident. The Gaelic-speaking population identifies as a distinct cultural group with characteristics of Indigenous Peoples, yet the process of Free, Prior and Informed Consent has not been followed. This lack of meaningful engagement calls into question the validity of the assessment and fails to adhere to established principles regarding participation in decisions that affect cultural and environmental interests.

There is a significant procedural oversight in the absence of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot adequately evaluate the social, cultural, and economic consequences for the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these issues place the proposal at odds with the National Planning Framework 4, especially regarding the safeguarding of historic assets and places. The failure to account for both tangible and intangible heritage, as well as the disregard for living cultural practices, constitutes a clear violation of policy requirements.

In summary, the neglect of living heritage, intangible cultural values, community rights, and legal obligations culminates in a substantial evidential void. The cultural impacts of the proposed development have not been adequately examined, and the application falls short in providing a thorough basis for assessing the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal's social impacts on the community have not been adequately assessed. The developer produced a Social Impact Assessment, which included discussions with local residents, but the complete report has not been shared. This lack of transparency creates a significant gap in the evidence, preventing both the public and the

responsible authorities from understanding the social risks revealed by the developer's research.

Residents are currently facing measurable stress, anxiety, and concern due to the project's size and its proximity to their homes. These effects stem from direct feedback and are not mere speculation. However, the withholding of the full assessment limits the opportunity for thorough examination of the results and restricts the capacity to assess their relevance in the decision-making process.

Furthermore, there is a perception that the proposal threatens community identity and cohesion, with the developer identifying "cultural loss" in their findings. Despite this recognition, these social impacts have not been properly included in the application nor have they been given adequate consideration. The failure to disclose the complete Social Impact Assessment conceals the true human and social consequences of the development.

This lack of transparency also weakens the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health ramifications is crucial for large developments, especially when they may affect the character and operation of the community. By not providing the complete set of data, the application does not offer a comprehensive evidential basis for weighing the potential benefits against the harms.

From a policy standpoint, the application does not align with the National Planning Framework 4 regarding health and wellbeing. It is essential for development to promote positive health outcomes and avoid negative impacts, yet the existing evidence suggests adverse effects that remain undisclosed. Without the complete assessment, it is impossible to confirm compliance with this policy.

The implications of these procedural shortcomings are considerable. The competent authority is unable to perform a thorough evaluation of socio-economic and health impacts without the complete Social Impact Assessment. This omission represents a significant flaw in the application and fails to satisfy the evidential requirements necessary under the Environmental Impact Assessment guidelines.

Overall, the decision not to disclose the full Social Impact Assessment, combined with clear evidence of negative impacts already felt by the community, leads to an incomplete and unreliable evaluation. This situation hinders a lawful determination and reinforces the view that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding seascape, landscape, and visual impacts is fundamentally flawed, lacking an adequate representation of the scale of change and the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and significant sense of remoteness. The close proximity of large-scale turbines to the shoreline would introduce a continuous and

overwhelming industrial presence, fundamentally altering this character and resulting in a permanent and irreversible change to the landscape.

Moreover, the application fails to represent the magnitude of the anticipated visual alterations. The height and closeness of the turbines would overshadow views from residential areas, historic sites, and frequently visited coastal locations. This would detrimentally affect visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not adequately convey this impact or its importance within the context of such a sensitive landscape.

Concerns arise concerning the methodology employed in selecting and presenting visual viewpoints. There is evidence indicating that these viewpoints may not adequately reflect the most sensitive receptors or the most adverse scenarios, particularly in relation to significant 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.

Additionally, there is a notable shortcoming in the assessment's failure to acknowledge the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these as separate entities rather than understanding their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the safeguarding of natural environments and historic assets. The proposed scale of change is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant locations. The lack of a comprehensive worst-case assessment further weakens any assertion of policy compliance.

It is evident that the identified impacts cannot be successfully mitigated. Given the size, height, and proximity of the turbines, their presence would be overpowering and inescapable. Consequently, the resulting transformation is not merely capable of being reduced to an acceptable level through mitigation; it is fundamentally and permanently altering the landscape.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal's reliance on undefined future measures to address construction and pollution risks raises significant concerns, particularly given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to disturbance and contamination from sediment. While the application acknowledges risks such as sediment mobilisation and the potential for accidental spills, it fails to provide adequate details regarding the prevention, control, or monitoring of these risks.

In addition, there is considerable uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The absence of robust modelling and clearly defined management strategies prevents a determination of the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to marine species and habitats that have already been identified as sensitive within the broader assessment.

The assessment is further compromised by the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application obstructs the evaluation of whether suitable safeguards are in place to address potential pollution events. This deferral introduces procedural risks and undermines the competent authority’s ability to assess the environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated prior to consent, and the absence of such information renders a lawful determination impossible. Moreover, the application does not demonstrate compliance with existing policy requirements related to environmental protection and water quality.

In summary, the combination of undefined mitigation measures, insufficient management plans, and uncertainty regarding potential impacts results in a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks, thereby reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

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

One major concern is the flawed assumption that fishing activity can be displaced without adverse consequences. The application lacks evidence to support the availability or accessibility of alternative fishing grounds capable of accommodating the

additional pressure. This significant omission raises the risk of overfishing in different areas, potentially leading to wider economic repercussions for the local fishing fleet. Without a comprehensive and evidence-based assessment, the impacts on fisheries and the livelihoods they support cannot be accurately understood.

The proposal also presents considerable risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling that would take place over an extended period is likely to disturb marine life across vast distances, with potential effects on species such as dolphins. The predicted disturbance to a large portion of the local bottlenose dolphin population is alarming, yet the application diminishes the significance of these effects without adequate supporting evidence.

There is a contradiction within the application itself, where the necessity for licences to permit harm to European Protected Species is acknowledged while simultaneously describing the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially when harm is anticipated at a level that requires legal authorisation.

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

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

In summary, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and unreliable. These shortcomings hinder a robust evaluation of impacts on marine life and fisheries, necessitating immediate and decisive action to address these critical issues.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a thorough assessment of the onshore infrastructure, which is essential for understanding the full impacts of what constitutes a single integrated project. The offshore turbines and onshore works are interconnected; however, they are evaluated independently, leading to a disjointed approach that obscures the real scale of environmental and socio-economic consequences.

Key onshore elements encompass cabling across protected moorland, the

construction of a substation near Stornoway, and access infrastructure traversing sensitive landscapes. Excavation in areas of deep peat, particularly within Barvas Moor, poses a threat to this significant carbon store and ecologically sensitive habitat. The lack of a comprehensive assessment means the project's overall environmental footprint cannot be fully understood.

By deferring the evaluation of onshore impacts, the application hampers the proper analysis of cumulative effects. The Environmental Impact Assessment process mandates a holistic consideration of all project components, yet the fragmented assessment of offshore and onshore elements obscures the combined impacts on peatlands, habitats, and local communities.

Moreover, sensitive habitats, such as machair systems and peatland environments, are at risk and are afforded policy protection. The application does not convincingly demonstrate that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, highlighting a significant evidential gap in biodiversity protection.

Concerns regarding carbon balance also arise. Disturbing peatland releases stored carbon, potentially generating a carbon debt that contradicts the goals of renewable energy development. The application inadequately addresses this concern or fails to show that the overall carbon balance remains favourable.

Additionally, routing infrastructure through active croft land introduces possible conflicts with existing land use and legal rights. The application does not provide evidence that necessary consents or processes have been initiated, which raises doubts about deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife in the Environmental Impact Assessment represents a significant omission. The proposal to introduce permanent red aviation lighting has the potential to create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment of the West Lewis coastline, an area noted for its exceptionally dark skies, which contribute to its environmental quality, cultural identity, and tourism value.

Moreover, the application neglects to evaluate the impacts of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This oversight is particularly concerning given the growing importance of dark skies to local identity and emerging tourism sectors, such as astro-tourism. The failure to adequately consider these factors creates a significant gap in the overall landscape and environmental assessment.

Of even greater concern is the lack of evaluation regarding the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit sensitivity to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collisions. The application does not present any lighting impact assessment or phototaxis study, leading to an inability to assess how aviation lighting may impact these species or contribute to increased mortality rates.

Additionally, the ornithological assessment's reliance on daytime survey data fails to address nocturnal activity or associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting. The lack of site-specific night-time data represents a critical gap in understanding ecological impacts.

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

From a policy standpoint, these omissions are in conflict with National Planning Framework 4, particularly concerning the protection of natural places and environmental quality. This oversight further undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is an integral element of the overall ecological framework.

In summary, the lack of any assessment related to dark skies and nocturnal wildlife constitutes a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete, precluding it from supporting a lawful determination.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm demonstrates significant shortcomings regarding sustainable development, as assessed against statutory obligations, national policies, and evidential standards. This proposal mirrors the issues that resulted in the refusal of the Lewis Wind Power application in 2008, when the scale of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it fails to address these crucial aspects

adequately.

There are substantial gaps in the evidential basis required for a thorough determination of the application. Key areas such as baseline data, the ambiguous design envelope, unspecified mitigation measures, and the exclusion of critical impact pathways—including nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects—are notably lacking. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of the likely significant effects and residual impacts associated with the proposal.

Additionally, procedural deficiencies are evident. The omission of a compliant Island Communities Impact Assessment violates statutory duties under the Islands (Scotland) Act 2018, while the failure to provide a complete Social Impact Assessment is a significant oversight. These inadequacies obstruct the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

In direct violation of National Planning Framework 4, the proposal fails to demonstrate adequate protection for biodiversity, natural spaces, and cultural heritage. There is no evidence that health and wellbeing impacts are acceptable, nor is there a demonstrated net economic benefit due to the lack of tourism impact modelling. The cumulative impacts from both offshore and onshore components have not been sufficiently evaluated, clouding the understanding of effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks persist and may be significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The evidential threshold needed to eliminate adverse effects beyond reasonable scientific doubt remains unmet, thereby activating the precautionary principle and preventing a lawful conclusion regarding the acceptability of the impacts.

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

When considering all these factors, the application proves to be procedurally and substantively unfit for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks obstructs a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuse consent on these grounds or invoke the appropriate regulatory provisions to compel the submission of the necessary missing information.

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

Additional Comments

We only recently bought a house in Shawbost. Had we known of these plans we would reconsider. However, now that we are here we prefer to fight against the will of politicians and multi-million dollar foreign corporations dominating us both physically and socially. This is a moral outrage.

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: 51E16932

Member of the public 957

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 the relevant marine licensing and Environmental Impact Assessment regimes. The application is located off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline and a near-pristine environment that reflects a strong cultural identity. However, the proposal raises fundamental concerns about its compatibility with statutory requirements, national policy, and the principles of sustainable development due to its scale, proximity, and design.

A review of the Environmental Impact Assessment Report and supporting documentation reveals critical deficiencies. The application lacks an adequate evidential basis for a lawful determination, as critical environmental data is missing, baseline information is both limited and inconsistent, and significant aspects of the proposal remain undefined. The use of a flexible design framework further complicates the ability to assess likely significant effects, while the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to facilitate a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

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

The unprecedented scale of the proposal in this location, with large turbines positioned near the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and inadequate for supporting a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report contains substantial deficiencies and does not deliver a comprehensive, clear, or dependable account of the potential environmental effects stemming from the proposal. A critical issue arises from the employment of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hinders the consistent application of a worst-case scenario, ultimately undermining the assessment's integrity. Consequently, the impacts detailed may not accurately reflect the development ultimately built, thus obscuring the true extent of environmental effects from both the public and the competent authority.

Moreover, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under these conditions implies that environmental harm will be addressed at a later stage, which hinders any meaningful evaluation of effectiveness or assessment of residual impacts. Such deferral of crucial information to post-consent stages is procedurally unacceptable and at odds with the intended purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and their mitigations be clearly established before determination.

Additionally, there are notable evidential shortcomings, including 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 in instances where conclusions of 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 reconciled with statutory requirements.

As a result, the application does not fulfil the evidential threshold needed under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, including requirements related to biodiversity protection and environmental integrity, as it cannot be shown that impacts have been fully assessed or that appropriate safeguards exist.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species 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 assessment of the proposed development is fundamentally flawed, exhibiting significant internal inconsistencies and gaps in evidence that compromise its conclusions. The presence of internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already experiencing declines, is not adequately addressed. The application fails to meet the required evidential standard to

demonstrate that these species will not be adversely affected. Furthermore, the development is situated within key foraging areas and migratory pathways, yet the evaluation does not thoroughly assess the implications of displacement, collision risk, or habitat loss.

A notable contradiction exists in the application, as the developer claims there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only invoked when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are unsupported by the evidence provided. The assessment also lacks sufficient evidence that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not sufficiently recognised, and reliance on modelling techniques introduces uncertainty, particularly for species in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially in cases where baseline data is incomplete and behavioural responses remain inadequately understood.

The siting of turbines within a recognised migratory corridor presents an additional and substantial risk, as it effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to sufficiently evaluate the long-term consequences 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 effects on the integrity of protected sites. The presence of contradictory findings, coupled with data deficiencies and modelling limitations, means that the standard of beyond reasonable scientific doubt has not been fulfilled. This situation invokes the precautionary principle, preventing a lawful conclusion in favour of consent.

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 demonstrate that internationally important seabird populations will not be adversely affected places the proposal at odds with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning cultural heritage and community identity is fundamentally flawed, as it overlooks the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply interwoven. The approach

taken in the application is overly simplistic, treating heritage merely as a collection of disconnected, static assets, rather than recognising their ongoing social, cultural, and spiritual significance within the community.

A notable shortcoming is evident in the handling of culturally significant locations, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are not merely historical landmarks; they are active spaces for burial and spiritual practice. However, the assessment wrongly categorises them as static elements, failing to take into account their continued use and the broader implications of development on their surroundings. This mischaracterisation leads to an incomplete cultural evaluation and overlooks their vital role in community life.

Moreover, the application neglects the assessment of intangible cultural heritage, which includes the Gaelic language, local traditions, and the deep-rooted relationship between the community and the coastal environment. These aspects are essential to the area's identity and were notably absent from the assessment, indicating a significant oversight. Without recognising these elements, a true understanding of the development's cultural impact remains elusive.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity, recognised as having characteristics of an Indigenous People. Yet, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement not only undermines the credibility of the assessment but also fails to adhere to established principles of participation in matters affecting cultural and environmental interests.

Additionally, there is a critical procedural failure concerning the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The omission of this assessment means that the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community. This lack of compliance hinders any lawful determination of the proposal.

From a policy standpoint, these shortcomings place the proposal in direct opposition to the National Planning Framework 4, particularly regarding the protection of historic sites and cultural spaces. The failure to consider both tangible and intangible heritage, alongside the recognition of living cultural practices, represents a notable deviation from required policies.

In summary, the deficiencies in assessing living heritage, intangible cultural value, community rights, and adherence to statutory obligations create a significant evidential gap. As a result, the cultural impacts of the development have not been thoroughly evaluated, and the application does not offer a robust basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding social impacts, health, and wellbeing is a critical issue that undermines the evaluation process. A Social Impact Assessment was commissioned by the developer and involved focus groups with local residents; however, the full report has not been made public. This significant gap in evidence inhibits both public understanding and the competent authority's ability to grasp the full extent of the social risks identified through the developer's own findings.

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

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

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

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

The procedural ramifications are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a substantial omission in the application, failing to meet the evidential standards established by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual and environmental impacts associated with the proposed development is severely lacking and does not adequately capture the extent of change or the sensitivity of the environment involved. The West Lewis coastline is characterised by its open Atlantic horizon, lack of development, and a strong sense of remoteness. The proposed installation of large-scale turbines near the shoreline would introduce a continuous industrial presence, fundamentally altering this character and resulting in a permanent transformation of the landscape that cannot be undone.

There are significant methodological issues related to the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not effectively represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises concerns that the assessment may have understated the magnitude of the visual impact, thereby compromising its reliability.

Moreover, the application fails to evaluate the interconnected nature of landscape, seascape, and cultural heritage adequately. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are linked through visual and spatial relationships to the Atlantic horizon. The assessment treats these heritage assets as isolated entities, neglecting their interdependence, which leads to an incomplete understanding of the impacts on their settings and cultural significance.

The potential industrialisation of the seascape would disrupt these vital relationships, altering the context in which heritage assets are perceived and diminishing their connection to the natural horizon. This impact is not merely visual; it poses broader cultural and spatial harm that the application has not properly assessed.

From a policy standpoint, the proposed development is at odds with the National Planning Framework 4, which aims to protect natural environments and historical assets. The anticipated scale of change is incompatible with the essential objectives of safeguarding landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case scenario analysis further undermines claims of compliance with relevant policy.

Additionally, it is evident that the negative impacts identified cannot be adequately mitigated. Given the scale, height, and proximity of the proposed turbines, their presence would be overwhelmingly dominant and unavoidable. Thus, the resulting changes to the landscape are fundamental and irreversible, rather than amenable to acceptable mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns regarding the assessment of construction and pollution risks, which is both incomplete and lacking the necessary detail to properly evaluate likely environmental effects. There is a substantial undertaking involved in seabed preparation and installation works within the challenging high-energy Atlantic environment. However, the application fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it leans on vague mitigation and contingency measures to be established after consent, which obstructs any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is particularly alarming, especially in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. While the application recognises risks such as sediment mobilisation and accidental chemical or oil spills, it does not offer sufficient information on how these issues will be prevented, controlled, or monitored.

Furthermore, there is uncertainty surrounding the scale and behaviour of sediment plumes generated from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it remains impossible to ascertain the extent, duration, or ecological effects of such impacts. This uncertainty also extends to the potential effects on marine species and habitats already identified as sensitive in the broader assessment.

Compounding these concerns is the absence of detailed emergency response procedures. By deferring contingency planning until after consent has been granted, the application hampers the ability to evaluate whether adequate safeguards are in place to address pollution events. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures prior to determination.

From a regulatory standpoint, deferring critical environmental safeguards stands in direct conflict with the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation are assessed before consent is granted; without this information, a lawful determination cannot be made. The application also fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

In conclusion, the combination of undefined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts results in a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks, further reinforcing the view that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal poses substantial risks to marine life and the local fishing industry, yet the assessment of fisheries and marine ecosystems is inadequate. The waters off the West

Lewis coast are home to both a rich marine ecosystem and a vibrant fishing community. However, the application does not convincingly demonstrate how these vital uses and habitats can be preserved or sustained without significant disruption.

A critical concern is the presumption that fishing activities can be shifted without adverse effects. The application lacks evidence regarding the availability or accessibility of alternative fishing grounds that could withstand increased pressure. This absence of information is troubling, as it raises the possibility of overfishing in other areas, potentially leading to broader economic ramifications for the local fishing fleet. Without a thorough, evidence-based evaluation, understanding the impacts on fisheries and associated livelihoods remains elusive.

Additionally, the proposal carries significant risks for marine species, particularly due to the underwater noise resulting from construction activities. Prolonged high-energy hammer piling is expected to cause disturbances over considerable distances, which may adversely affect species, including dolphins. The predicted disturbance to a notable portion of the local bottlenose dolphin population is a serious concern. Nonetheless, the application minimises the importance of these impacts without adequate supporting evidence.

There is a notable inconsistency in the application where the need for licenses to permit harm to European Protected Species is recognised, while simultaneously, impacts are described as negligible. This contradiction calls into question the reliability of the assessment and raises serious compliance concerns with the Habitats Regulations, especially when harm is anticipated to an extent that necessitates legal authorisation.

Moreover, the assessment neglects to address cumulative impacts stemming from multiple factors such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these combined pressures, it is impossible to determine the overall consequences for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 and the National Marine Plan. It does not provide evidence that the development can operate alongside existing marine users or mitigate unacceptable impacts on marine biodiversity, which precludes any conclusion that the proposal aligns with sustainable development principles.

In summary, the deficiencies in evidence concerning fishing displacement, the undervaluation of acoustic impacts, and the internal inconsistencies significantly undermine the assessment's credibility. These shortcomings hinder a comprehensive evaluation of the potential consequences for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is significantly lacking and does not take into account the full range of impacts stemming from what constitutes a single integrated project. The offshore turbines and the onshore works are fundamentally interconnected, yet they are evaluated separately, leading to a fragmented perspective that obscures the true magnitude of both environmental and socio-economic consequences.

Included in the onshore aspects are cabling across protected moorland, the construction of a substation near Stornoway, and the requisite access infrastructure that traverses sensitive landscapes. These activities entail excavation through areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and is an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, which impedes a complete understanding of the project's overall environmental footprint.

The exclusion or deferral of onshore impact assessments hampers the ability to properly evaluate cumulative effects. According to the Environmental Impact Assessment process, all parts of a project must be considered collectively; however, the disjointed treatment of offshore and onshore components results in a failure to fully comprehend their combined impacts on peatlands, habitats, and local communities.

There are considerable risks posed to sensitive habitats, including machair systems and peatland environments that are protected by policy. The application does not adequately demonstrate that the effects on these habitats have been thoroughly assessed, nor does it show that suitable avoidance measures have been implemented. This raises a significant evidential gap concerning biodiversity protection.

Furthermore, the proposal brings up important concerns related to carbon balance. Disturbing peatland releases stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this concern or provide assurance that the overall carbon balance remains beneficial.

Additionally, routing the infrastructure through active croft land may create conflicts with existing land use and legal rights. The application fails to present evidence that the required consents or processes have been initiated, which raises doubts about its deliverability and lawful implementation.

From a policy standpoint, the lack of a comprehensive assessment of the project as a whole and the failure to demonstrate protection for peatlands, habitats, and land use interests runs counter to the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further undermines the validity of the application.

In summary, the segregation of project components, the absence of a detailed assessment, and the lack of supporting evidence regarding environmental and land use

impacts render this portion of the application incomplete and unreliable, ultimately preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment contains a significant gap, as it fails to address the crucial aspects of dark skies and nocturnal wildlife. The West Lewis coastline, known for its exceptionally dark skies, is vital for environmental quality, cultural identity, and tourism. The proposal introduces permanent red aviation lighting that would create a persistent and disruptive “wall of light” across the western horizon, fundamentally altering the night-time environment.

The application neglects to evaluate how this lighting impacts visual amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly concerning given the role of dark skies in the area's identity and the potential growth of sectors such as astro-tourism. This failure to assess such impacts results in a clear deficiency in the overall landscape and environmental evaluation.

Moreover, there is a lack of consideration for the effects on nocturnal wildlife. Certain species, including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, are notably sensitive to artificial lighting, which can lead to disorientation and a heightened risk of collisions. The absence of any lighting impact assessment or a study on phototaxis means there is no evaluation of how aviation lighting might affect these species or increase mortality rates.

The reliance on daytime survey data in the ornithological assessment further compounds this issue, as it does not adequately capture nocturnal activities or associated risks. Other species, such as Kittiwakes, which may forage or migrate during the night, are equally at risk of disorientation from artificial lighting, yet this has not been assessed. Without site-specific night-time data, the understanding of ecological impacts remains critically deficient.

Assessing nocturnal impacts is essential for determining whether protected species or designated sites might be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, thereby invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, the absence of this assessment contradicts the National Planning Framework 4's directives regarding the protection of natural places and environmental quality. Furthermore, it diminishes the overall evaluation of landscape and seascape impacts, as the character of night-time is a fundamental aspect of the environment.

In summary, the lack of any evaluation concerning dark skies and nocturnal wildlife represents a significant evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and incapable of substantiating a lawful determination.

TOURISM

The application acknowledges that 86% of visitors are drawn by scenery. However, it does not provide a quantified assessment of how large-scale offshore infrastructure would influence visitor numbers or overall economic contributions. The assessment of tourism impacts is materially deficient, failing to evaluate the economic and social consequences for a key sector of the Isle of Lewis economy. Tourism is fundamentally dependent on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness.

Tourism has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Despite this significant increase, the application neglects to model how the industrialisation of the seascape and loss of environmental quality would affect Tourism Gross Value Added or the wider economic resilience of the region. Without such analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or adversely impact this established and growing sector.

Additionally, the assessment overlooks the vital role of environmental quality in supporting tourism. The importance of unspoiled landscapes and dark skies to visitor experience, as well as emerging markets such as nature-based tourism and astro-tourism, are not addressed. The absence of a Dark Skies Assessment further exacerbates this oversight, creating a significant gap in understanding the impacts on a recognised and expanding segment of the local economy.

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

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4, particularly regarding economic impact and the need to show net benefit. It also conflicts with strategic objectives that highlight tourism as a priority growth sector. Furthermore, it does not provide adequate evidence to enable the competent authority to assess the economic consequences of the proposal.

The collective failure to quantify tourism impacts, assess environmental drivers of visitor behaviour, and consider the island's economic dependency results in a considerable evidential gap. This deficiency hinders 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 must be evaluated in light of its failure to meet the standards of sustainable development as dictated by statutory

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

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

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

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

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

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

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

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

Additional Comments

This is my home and has been for my ancestors for hundreds of years and I strongly object to the destruction this project will cause with absolutely NO benefit to the island . It is not needed nor wanted
.
We are blessed to live in an area of outstanding natural beauty with an abundance of wildlife including Whales , Dolphins and seabirds . These turbines will be slap bang in the middle of the path of our migrating birds no doubt causing the deaths of many . The destruction of the sea bed will have a huge impact on crustaceans and affect the livelihoods of those who fish for them . Our famous “dark skies “will be obliterated and the noise will affect many adversely who live near them .
Our tourism industry would suffer . Who wants to visit our ancient sites like the Callanish stones which are very atmospheric and look at massive turbines in the background ?
I have no objection to ‘green energy’ per se but this is far from green . Tons of concrete , micro plastics from blades into our seas and the fact that none of it is recyclable .
Truthfully I can’t find one single thing that would be worth the destruction this project will bring .
If this goes ahead I would be left with no choice but to leave . I couldn’t bear to see the destruction of my home . It would break my heart .

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: 04FFB57E