Member of the public 958

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 is submitted under relevant marine licensing and Environmental Impact Assessment regimes. The application raises significant concerns related to planning, environmental, cultural, and procedural matters, as identified in a review of the Environmental Impact Assessment Report and associated documents. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The application lacks a solid evidential basis necessary for a lawful determination. There is missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The flexible design framework used hinders a clear understanding of potential significant effects, and the unsubstantiated reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation does not provide a comprehensive understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not backed by adequate evidence.

Policy conflicts are evident and significant. The proposal is at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency pertains particularly to biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements regarding the protection of biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests required for consent and weaken the capacity of the competent authority to determine that the development aligns with policy requirements.

The unprecedented scale of the proposal raises further concerns, with large turbines located close to the shoreline. This positioning creates significant issues relating to landscape capacity, visual dominance, and environmental impact. Overall, the combination of insufficient information, undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance indicates that the application is incomplete and does not support a lawful determination. In light of these factors, the precautionary principle should apply.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and lacks a comprehensive, transparent, and dependable evaluation of the potential environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or

configurations, creates considerable uncertainty. This approach compromises the integrity of the assessment, meaning that the impacts described may not accurately reflect the final development, thus hindering both public understanding and that of the competent authority regarding the true scale of environmental effects.

Moreover, the application places considerable reliance on undefined mitigation measures, monitoring strategies, and management plans that have yet to be established. Consequently, consent is sought on the premise that environmental damage will be rectified later, obstructing any substantial evaluation of efficacy or assessment of remaining impacts. This postponement of critical information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which necessitates that significant effects and mitigations are clearly outlined prior to any decision-making.

Additionally, there are serious evidential shortcomings, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This generates uncertainty regarding the magnitude and significance of impacts, particularly when negligible or non-significant effects are asserted without robust supporting data. The lack of adequate information obstructs a clear comprehension of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be aligned with statutory requirements.

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

In summary, the reliance on an ambiguous design envelope, the absence of specified mitigation measures, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies inhibit a lawful and robust appraisal of environmental effects, leaving the competent authority incapable of making an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application lacks a structured and evidence-based assessment of alternatives, which is a fundamental requirement of the Environmental Impact Assessment regime. Instead of offering a reasoned comparison of viable alternatives based on environmental impacts, it merely recounts the project's development. This method does not sufficiently prove that less harmful options have been properly identified, assessed, and chosen over more damaging ones.

There is no clear or transparent comparison of potential offshore locations, scales of

development, or design configurations. Notably, the proposal fails to show that the developer has adequately considered placing turbines further offshore, where there would likely be reduced visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, along with the critical nature of proximity to the shore in evaluating impact, highlights the necessity of such analysis. The lack of this examination means there is no assurance that the proposed siting is indeed the least damaging alternative.

The issues extend to cable routing and landfall assessments, revealing a lack of evidence that alternative routes have been thoroughly investigated to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis suggest that the application has not incorporated mitigation by design, instead relying on post-design mitigation measures.

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

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, especially regarding the protection of natural areas, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant omission, contributing to the conclusion that the application has not undergone adequate evaluation and cannot be lawfully determined.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species presents significant deficiencies that compromise an accurate understanding of the ecological receptors in the West Lewis coastal environment. This area is known for its sensitivity and biological activity; however, the incomplete baseline data and inadequate methodologies employed do not effectively capture the presence, behaviour, and habitat use of key species. Consequently, the evaluation lacks a reliable evidential basis for assessing potential impacts.

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

Additionally, there are substantial gaps in the evaluation of basking sharks, with the assessment relying heavily on aerial surveys that introduce notable detection biases,

particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that show a frequent use of the area by these sharks. The omission of such critical data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment is fundamentally flawed, containing significant evidence gaps and internal inconsistencies that compromise its conclusions. The application does not adequately demonstrate, to the necessary evidential standard, 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. This development is situated within crucial foraging areas and migratory pathways, yet the assessment fails to thoroughly evaluate the potential implications of displacement, collision risk, or habitat loss.

There is a critical contradiction within the application; the developer asserts there will be no significant adverse effects while also proposing a Habitats Regulations derogation case, which is applicable only when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment, suggesting that the conclusions presented lack support from the evidence on which they are based. The evidence provided does not sufficiently establish that seabirds connected to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is inadequately acknowledged, and the reliance on modelling introduces uncertainty, particularly for species experiencing severe declines like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially where baseline data is lacking and behavioural responses

are not fully understood.

The placement of turbines within a recognised migratory corridor poses an additional and serious risk, effectively creating a barrier in a primary flight path utilised by species travelling between the United Kingdom and Iceland. The application does not sufficiently assess the long-term effects of ongoing mortality in this corridor or the potential consequences for species with relatively small global populations.

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

These identified deficiencies also signify 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 opposition to national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The inadequacy of the assessment regarding cultural heritage and community identity is glaring, as it does not recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. Instead of understanding heritage as an evolving part of community life, the application adopts a simplistic view, reducing it to isolated, static assets.

A significant oversight is apparent in the treatment of sites of cultural importance, particularly the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practice, yet they are incorrectly categorised as mere static features. This mischaracterisation neglects their ongoing significance and the implications of development on their surroundings, leading to an incomplete assessment of cultural effects and overlooking their vital role in community life.

Equally troubling is the failure to consider intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the local community and the coastal environment. These aspects are fundamental to the area's identity but have been disregarded in the assessment, marking a substantial omission that prevents a comprehensive understanding of the development's cultural impact.

Concerns regarding community rights and engagement further complicate the

situation. The Gaelic-speaking population embodies a unique cultural identity with recognised characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement casts doubt on the legitimacy of the assessment and contravenes established principles of participation in matters affecting cultural and environmental interests.

Moreover, a critical procedural failure lies in the absence of a compliant Island Communities Impact Assessment, a statutory requirement mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot adequately fulfil its legal obligation to assess the social, cultural, and economic ramifications on the island community, resulting in a significant legal gap.

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

In summary, the lack of assessment concerning living heritage, intangible cultural value, community rights, and adherence to statutory obligations culminates in a significant evidential gap. The cultural impacts of the proposed development have not been sufficiently evaluated, leaving the application lacking a robust foundation for assessing the true cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency in the assessment of social impacts, health, and wellbeing is evident and raises serious concerns regarding the validity of the evaluation. The developer has commissioned a Social Impact Assessment that involved focus groups with local residents, yet the full report remains unpublished. This absence of the complete report creates a significant evidential gap, preventing the public and the competent authority from gaining a comprehensive understanding of the social risks identified in the developer's own research.

There are indications that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts have been derived from direct engagement with the community and are therefore based on observable facts rather than speculation. However, the failure to disclose the full assessment hinders proper scrutiny of these findings, limiting the ability to assess their significance in the decision-making process.

Furthermore, the proposal is perceived as a direct threat to community identity and cohesion, with the developer’s findings indicating potential “cultural loss.” Despite this recognition, such impacts have not been adequately incorporated into the main application or given the appropriate consideration. The withholding of the complete 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 the social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. The lack of a comprehensive dataset in the application fails to provide a solid evidential basis for weighing the benefits against the potential harm.

From a policy standpoint, the application does not adequately demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development proposals must promote positive health outcomes and mitigate harm; however, the evidence available suggests existing adverse effects that have not been fully revealed. Without the complete assessment, it is impossible to demonstrate compliance with this crucial policy.

The procedural implications are profound. The competent authority cannot conduct a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This absence constitutes a material omission in the application, representing a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, in conjunction with existing evidence of adverse impacts, results in an incomplete and unreliable assessment. This inadequacy precludes a lawful determination and supports the conclusion that the application is not underpinned by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the impacts on seascape, landscape, and visual characteristics is fundamentally inadequate, failing to accurately capture the extent of change or the sensitivity of the environment. The character of the West Lewis coastline is marked by its unspoiled Atlantic horizon and a pronounced sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the coastline would establish a continuous industrial presence, fundamentally transforming this unique character and leading to a permanent alteration of the landscape.

There are significant shortcomings in how the visual impacts have been represented. The scale and closeness of the turbines would dominate views from residential areas, historic sites, and well-frequented coastal locations, adversely affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The evaluation does not adequately communicate this impact or its significance within the context of such a sensitive landscape.

Moreover, methodological issues arise from the choice and portrayal of visual viewpoints. Evidence indicates that the selected viewpoints may not sufficiently represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage locations and high-value landscapes. This lack of comprehensive representation raises concerns that the visual impact may have been minimised, thus

questioning the reliability of the assessment.

A further critical omission is the failure to examine the interconnectedness of landscape, seascape, and cultural heritage. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of an integrated landscape setting that is visually and spatially connected to the Atlantic horizon. The assessment regards these assets in isolation, neglecting their interrelatedness and leading to an incomplete appraisal of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, affecting the context in which heritage sites are perceived and severing their link to the natural horizon. This not only signifies a visual impact but also inflicts broader cultural and spatial harm that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural environments and historical assets. The proposed scale of change is inconsistent with the obligation to protect landscape character, visual amenity, and the settings of culturally significant sites. The failure to conduct a thorough worst-case scenario assessment further weakens any assertions of compliance with policy requirements.

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

Overall, the assessment does not reliably portray the extent of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These deficiencies hinder an accurate evaluation and support the conclusion that the proposal is inconsistent with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works within a high-energy Atlantic environment, yet the assessment of construction and pollution risks is inadequate. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans, leading the application to depend on mitigation and contingency measures that are to be prepared after consent. This lack of detail obstructs a meaningful assessment of their adequacy or effectiveness.

The sensitivity of the receiving environment raises further concerns. The West Lewis coastline features clean coastal waters and crucial habitats that are vulnerable to both sediment disturbance and contamination. While the application recognises risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide sufficient detail on prevention, control, or monitoring measures for these risks.

Additionally, uncertainty surrounds the scale and behaviour of sediment plumes

resulting from seabed disturbance and cable installation. Without solid modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts, especially on marine species and habitats identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. The deferral of contingency planning to a post-consent stage hinders the evaluation of whether adequate safeguards are in place for responding to pollution events. This situation introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures during the decision-making process.

From a regulatory standpoint, the postponement 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 without this information, a lawful determination cannot be achieved. The application also does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

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

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

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure remains notably incomplete, failing to encompass the full range of impacts associated with this integrated project. The interconnection between the offshore turbines and the onshore works is vital; however, they are evaluated separately, leading to a disjointed analysis that obscures the actual environmental and socio-economic consequences.

Among the onshore elements are cabling across protected moorland and the construction of a substation near Stornoway, accompanied by access infrastructure traversing sensitive landscapes. These undertakings involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and ecologically delicate habitat. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the overall environmental footprint of the project.

The decision to exclude or defer the assessment of onshore impacts obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components are examined together; however, the distinct treatment of offshore and onshore elements results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

Risks to sensitive habitats, including machair systems and peatland environments, are significant and should be protected under policy. The application does not adequately

demonstrate that impacts on these habitats have been fully evaluated or that appropriate avoidance measures have been implemented, creating a substantial evidential gap concerning biodiversity protection.

Additionally, concerns regarding carbon balance arise from the disturbance of peatland, which releases stored carbon and could lead to a carbon debt that contradicts the goals of renewable energy development. The application inadequately addresses this aspect and fails to demonstrate that the overall carbon balance is indeed beneficial.

The routing of infrastructure through active croft land introduces potential conflicts with established land use and legal rights. There is insufficient evidence that necessary consents or processes have been initiated, raising doubts about the deliverability and lawful execution of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in the area's environmental quality, cultural identity, and tourism value. The proposed development would introduce permanent red aviation lighting that is visible over long distances, creating a continuous and intrusive "wall of light" effect across the western horizon. This alteration would fundamentally change the night-time environment.

There is no assessment of the impact this lighting would have on visual amenity, landscape character, or the experiences of residents and visitors. Such an omission is particularly significant given the importance of dark skies to the identity of the area and to emerging sectors like astro-tourism. The failure to consider these impacts reveals a clear gap in the overall landscape and environmental assessment.

Equally concerning is the lack of evaluation regarding the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are highly sensitive to artificial lighting due to phototaxis, which can result in disorientation and increased collision risks. The application lacks a lighting impact assessment or phototaxis study and thus fails to evaluate how the proposed aviation lighting may affect these species or raise mortality rates.

Furthermore, the reliance on daytime survey data in the ornithological assessment neglects nocturnal activity and associated risks. For instance, species like Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has not been examined. The absence of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

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

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

Overall, 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 acknowledges that 86% of visitors are drawn to the Isle of Lewis by its scenery. However, it lacks a quantified assessment of how large-scale offshore infrastructure might affect visitor numbers, behaviour, or the overall economic contribution of tourism. This is particularly concerning given the significant growth in the tourism sector, which has increased 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 failure to model the potential impacts of industrialisation on the seascape and environmental quality raises serious questions about the net economic benefit of the development and its implications for a vital and growing sector.

Moreover, the assessment neglects the critical role of environmental quality in sustaining tourism. Unspoiled landscapes and dark skies are fundamental to visitor experiences, as well as emerging markets like nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment exacerbates this issue, creating a notable gap in understanding the potential impacts on a significant and developing part of the local economy.

In an island community where economic diversification is limited, the lack of a comprehensive 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 fails to demonstrate compliance with National Planning Framework 4, particularly regarding the economic impact and the necessity to show net benefit. Furthermore, it conflicts with strategic objectives that position tourism as a priority growth sector and does not provide adequate evidence for the competent authority to evaluate the economic consequences of the proposal.

Collectively, the failure to quantify tourism impacts, assess environmental influences on visitor behaviour, and recognise the island's economic reliance results in a significant evidential gap. This prevents a thorough evaluation of economic effects and supports the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the criteria for sustainable development as required by statutory duties, national policy, and evidential standards. This application echoes the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Despite the introduction of a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current proposal fails to adequately address these concerns.

A reliable evidential basis for determination is not provided in the application. There are notable deficiencies in baseline data, reliance on an ill-defined design envelope, unspecified mitigation measures, and key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects are omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of the likely significant effects or residual impacts.

There are procedural failures present in the application. The lack of a compliant Island Communities Impact Assessment is a violation of the statutory duty outlined in the Islands (Scotland) Act 2018, while the failure to present a full Social Impact Assessment represents a significant omission. These shortcomings impede the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

The proposal contradicts the principles of National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage, fails to ensure that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit as a result of missing tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring the potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments relating to marine ecology, seabirds, protected species, and marine mammals are either incomplete or internally inconsistent. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, which activates the precautionary principle, thus preventing any lawful determination that impacts are acceptable.

The proposal also threatens to bring about substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption to cultural and visual relationships, and impacts on tourism are all permanent effects that cannot be mitigated to an acceptable level.

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: F0EA9C8D

Member of the public 959

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

Dear Sir/Madam

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

The application is deficient in providing a sufficient evidential foundation necessary for a lawful decision. It lacks critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, key elements of the proposal remain unspecified. The reliance on a flexible design framework obscures the understanding of potential significant effects, and the proposed mitigation measures, which have not yet been defined, prevent any assessment of their effectiveness. Consequently, the documentation fails to furnish a comprehensive understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidential support.

There are significant policy inconsistencies associated with the proposal. It does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly regarding biodiversity, natural landscapes, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national obligations aimed at safeguarding biodiversity, climate interests, and environmental integrity. These policy conflicts directly relate to the statutory tests necessary for consent and impede the competent authority's capacity to ascertain the development's acceptability in policy terms.

The proposal's scale is unprecedented in this area, with large turbines being positioned very close to the shoreline, raising considerable concerns about landscape capacity, visual dominance, and environmental consequences. In conclusion, the combination of insufficient information, dependence on undefined mitigation measures, evidential shortcomings, and clear non-compliance with policy guidelines indicates that the application is incomplete and cannot support a lawful determination. Under these circumstances, the application of the precautionary principle is warranted.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that undermine its reliability and completeness. A flexible Project Design Envelope is employed, lacking firm commitments to specific turbine dimensions, layouts, or configurations. This introduces substantial uncertainty and hampers the ability to consistently apply a worst-case scenario, which is essential for a credible assessment. Consequently, the impacts detailed may not accurately represent those of the development that would eventually be constructed, limiting both public understanding and the competent authority's ability to grasp the full extent of environmental effects.

Moreover, the application places considerable reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. Seeking consent under these circumstances defers critical information to stages post-consent, making it impossible to evaluate the effectiveness of these measures or assess residual impacts meaningfully. This procedural approach is unacceptable and contradicts the fundamental objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and appropriate mitigations are clarified before any determination can be made.

Evidential shortcomings also permeate the assessment, with notable gaps in baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly where claims of negligible or non-significant effects lack robust supporting data. Insufficient information precludes a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that fails to meet statutory requirements.

As such, the application does not satisfy the evidential threshold stipulated under the Habitats Regulations, which is necessary 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 align with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it fails to demonstrate that impacts have been comprehensively assessed or that appropriate safeguards are established.

In summary, the combination of an undefined design envelope, unspecified mitigation measures, and significant gaps in baseline data culminates in an unreliable and incomplete Environmental Impact Assessment Report. These shortcomings inhibit a lawful and rigorous evaluation of environmental effects and leave the competent authority without the necessary information to make a well-informed determination regarding the application.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed assessment of marine ecology and protected species is fundamentally inadequate, lacking a comprehensive and reliable understanding of the ecological receptors present within the West Lewis coastal environment. This area is a biologically active marine system, yet the baseline data provided is insufficient, and the

methodologies employed do not effectively capture crucial information regarding species presence, behaviour, and habitat utilisation. Consequently, the assessment fails to establish a robust evidential foundation for evaluating potential impacts.

Significant omissions are evident, particularly concerning otters, which are classified as a European Protected Species. The application does not adequately recognise or assess their utilisation of coastal areas for foraging and movement. By neglecting to consider their core foraging range and behavioural patterns, the potential implications of construction disturbance, noise, and increased human activity remain inadequately evaluated. This oversight undermines any claims regarding the absence of significant effects on this species.

Further issues are present in the assessment of basking sharks, where an overreliance on aerial surveys leads to considerable detection bias, especially under Atlantic conditions. Such an approach is likely to underestimate the presence of these sharks, particularly when compared to established land-based observations that indicate their frequent use of these waters. The failure to appropriately incorporate or consider this data results in an incomplete baseline, thereby weakening the reliability of the conclusions drawn.

These methodological shortcomings mean that any conclusions suggesting negligible or non-significant effects are based more on assumptions than on sound evidence. The lack of adequate baseline data further obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation generates uncertainty about the actual risk posed to marine species and habitats.

From a regulatory viewpoint, the application does not fulfil the requirements set by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced prevents any exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the precautionary principle. Given these circumstances, it is not lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application for development lacks the necessary evidential support to conclude that there will be no adverse effects on protected seabird populations. It fails to provide adequate evidence regarding species associated with significant sites like the Lewis Peatlands and St Kilda. The assessment does not thoroughly consider the vital feeding grounds of these birds, particularly concerning declining species such as Kittiwakes and Fulmars. There are significant gaps and weaknesses in the methodologies used,

which may lead to an underestimation of mortality rates, especially given that baseline data is incomplete and the behavioural responses of the species are not fully understood.

Furthermore, the site is situated within a key migratory corridor, posing serious risks to birds travelling between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term impacts of potential sustained mortality in this corridor, nor does it address how this might affect species with smaller global populations.

The conclusions drawn within the application are contradictory. While the developer claims there will be no significant adverse effects, they also present a Habitats Regulations derogation case, which suggests that they anticipate potential harm. This inconsistency raises doubts about the assessment's reliability and its alignment with scientific standards. As such, it does not meet the evidential threshold required to ascertain that there will be no adverse effects on the integrity of protected sites.

In addition, the application fails to comply with the National Planning Framework 4 concerning biodiversity protection. The inability to demonstrate that internationally important seabird populations will not be adversely affected puts the proposal at odds with national policy. Collectively, these deficiencies in the assessment render it unreliable, as they stem from internal inconsistencies, methodological shortcomings, and insufficient evidence. Overall, these issues mean that the application does not fulfil the statutory requirements necessary for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage in the application is fundamentally flawed, neglecting to recognise the West Lewis coastline as a vibrant cultural landscape where the environment, language, traditions, and community are deeply intertwined. The approach taken is overly simplistic, viewing heritage merely as a collection of static assets rather than appreciating their dynamic social, cultural, and spiritual significance within the community.

A significant shortcoming is the treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices; however, they are characterised merely as static features in the assessment. This oversight fails to acknowledge their ongoing significance and the implications of development on their surroundings, leading to an incomplete analysis of cultural effects and disregarding their importance in the fabric of community life.

Moreover, the assessment neglects to consider intangible cultural heritage, such as the Gaelic language and local traditions, along with the enduring connection between the community and the coastal environment. These aspects are vital to the region's identity but are entirely omitted from the analysis, representing a substantial gap. The absence of these considerations means that the cultural implications of the development

cannot be fully comprehended.

Concerns also arise regarding community engagement and rights. The Gaelic-speaking population embodies a unique cultural identity with traits recognised as characteristic of Indigenous Peoples, yet there has been no process of Free, Prior, and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and fails to adhere to established principles of community participation in decisions that affect their cultural and environmental concerns.

Additionally, there is a critical procedural oversight due to the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot meet its legal obligations to assess the social, cultural, and economic impacts on the island community. This alone hinders a lawful determination of the application.

From a policy standpoint, these shortcomings contradict the requirements set forth in National Planning Framework 4, especially regarding the preservation of historical assets and places. The neglect of both tangible and intangible heritage and the failure to acknowledge living cultural practices indicate a clear divergence from necessary policy expectations.

In summary, the lack of consideration for living heritage, intangible cultural values, community rights, and statutory responsibilities has resulted in a significant evidential gap. The cultural consequences of the proposed development have not been adequately evaluated, and the application falls short in providing a robust basis for understanding the true cultural cost associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

reliability of the assessment.

Additionally, the assessment neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context, linked visually and spatially to the Atlantic horizon. The evaluation treats these sites as isolated rather than recognising their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The absence of clearly defined mitigation measures and detailed management plans significantly undermines the assessment of construction and pollution risks. This proposal necessitates substantial seabed preparation and installation works in a high-energy Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. The reliance on mitigation and contingency measures to be developed after consent raises serious concerns, as it hinders a meaningful evaluation of their adequacy and effectiveness.

Particularly troubling is the sensitivity of the receiving environment along the West Lewis coastline, which is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks, such as sediment mobilisation and accidental chemical or oil spills, it fails to provide sufficient detail on prevention, control, or monitoring strategies.

There is significant 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 effects of these potential impacts. This uncertainty also extends to marine species and habitats that have been identified as sensitive within the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By deferring contingency planning to a post-consent stage, the application obstructs the evaluation of whether appropriate safeguards are in place to address pollution events. This introduces procedural risks and undermines the ability of the competent authority to assess environmental protection measures at the critical point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated prior to consent; without such information, a lawful determination cannot occur. Furthermore, the application does not demonstrate compliance with the requisite policies related to environmental protection and water quality.

In summary, the combination of undefined mitigation measures, inadequate management plans, and uncertainty surrounding potential impacts results in a materially deficient assessment. These deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents significant deficiencies in the assessment of fisheries and marine life, failing to provide a comprehensive evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry, yet the proposal does not adequately demonstrate how these critical uses and habitats can be preserved without causing substantial disruption.

One of the most pressing concerns lies in the assumption that fishing activities can be displaced without repercussions. The application lacks evidence to support the existence, accessibility, or capacity of alternative fishing grounds that could absorb the resultant pressure. This critical omission poses a risk of overfishing in different areas and threatens economic stability for the local fishing fleet. Without a thorough and evidence-based analysis, the potential impacts on fisheries and the livelihoods dependent on them remain unclear.

Moreover, the proposal introduces significant risks to marine species, particularly from the underwater noise generated during construction. The anticipated high-energy hammer piling over an extended duration is likely to disturb marine life over large distances, adversely affecting species such as dolphins. The predicted disturbance to a

considerable portion of the local bottlenose dolphin population raises urgent concerns, yet the application minimises the significance of these disturbances without presenting sufficient evidence.

There is a notable inconsistency within the application itself, where the requirement for licences to permit harm to European Protected Species is acknowledged, while simultaneously categorising impacts as negligible. This contradiction undermines the assessment's credibility and raises serious questions regarding compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Additionally, the assessment neglects to address the cumulative impacts stemming from multiple stressors, including habitat disturbance, noise, and the displacement of fishing activities. Without a holistic evaluation of these interconnected effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic environment.

From a policy perspective, the application falls short of demonstrating compliance with the National Planning Framework 4 or the National Marine Plan. It fails to establish that the proposed development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby hindering any conclusion that the proposal aligns with sustainable development principles.

In summary, the lack of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the presence of internal contradictions render the assessment incomplete and untrustworthy. These shortcomings obstruct a proper evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is significantly lacking, failing to take into account the full extent of impacts associated with what is essentially a singular integrated project. The interconnection between offshore turbines and onshore works necessitates a unified assessment; however, they are evaluated separately. This fragmented approach obscures the true scale of environmental and socio-economic effects.

Onshore components involve the installation of cabling across protected moorland and the construction of a substation near Stornoway, along with access infrastructure traversing sensitive landscapes. Notably, these works include excavation in areas of deep peat, particularly within Barvas Moor, a crucial carbon store and ecologically sensitive habitat. The application does not adequately assess these impacts, hindering a complete understanding of the project's overall environmental footprint.

By neglecting to assess onshore impacts comprehensively, the application fails to enable a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be considered

collectively; the disjointed assessment of offshore and onshore elements prevents a full understanding of the combined impacts on peatlands, habitats, and local communities.

There are also considerable risks posed to sensitive habitats, including machair systems and peatland environments, which hold policy protection. The application does not show that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, revealing a clear evidential gap concerning biodiversity protection.

Moreover, the proposal raises issues related to carbon balance. Disturbance of peatland can release stored carbon, potentially resulting in a carbon debt that runs counter to the aims of renewable energy development. The application fails to address this concern adequately or show that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land raises the possibility of conflicts with existing land use and legal rights. The application does not provide evidence that the required consents or processes have been initiated, leading to uncertainties regarding deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

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

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

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

SUMMARY

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

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

Moreover, there are evident procedural failures. The lack of a compliant Island Communities Impact Assessment violates statutory obligations set out in the Islands (Scotland) Act 2018. Additionally, the failure to disclose a full Social Impact Assessment constitutes a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies render the application unsuitable for determination.

The proposal also contradicts the National Planning Framework 4 by failing to

demonstrate adequate protection for biodiversity, natural environments, and cultural heritage. It does not adequately address health and wellbeing impacts or provide evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore elements have not been thoroughly assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

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

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

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

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: 71E40588

Member of the public 960

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm. The application was submitted under the marine licensing and Environmental Impact Assessment regimes. After reviewing the Environmental Impact Assessment Report and the related documentation, this objection highlights several deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, nearly pristine environment, and strong cultural identity. The design, scale, and proximity of the project raise significant concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks sufficient evidential support for a lawful determination. Key environmental data is absent, baseline information is inconsistent and limited, and important elements of the proposal remain undefined. The flexible design framework used in the application hampers a clear assessment of potential significant effects. Furthermore, the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not backed by solid evidence.

There are notable policy inconsistencies present. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate concerns, and environmental integrity. Such conflicts impact the statutory tests necessary for consent and undermine the ability of the relevant authority to determine that the development aligns with policy standards.

The scale of this proposal is unprecedented in this area, with large turbines situated near the shoreline, raising significant issues regarding landscape capacity, visual dominance, and environmental effects. The combination of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy violations illustrates that the application is incomplete and cannot support a lawful determination. In light of these concerns, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, transparent, or dependable evaluation of the proposed development's environmental consequences. A significant concern is the use of a flexible Project Design Envelope, which lacks commitment to precise turbine specifications, configurations, or layouts. This introduces considerable uncertainty and obstructs a thorough application of a worst-case scenario, thereby compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately depict the development that will eventually be constructed, which hampers both public understanding and the competent authority's ability to grasp the genuine extent of environmental effects.

Moreover, the application places excessive reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. As consent is sought under the premise that any environmental harm will be rectified in the future, this prevents any meaningful assessment of their efficacy or an evaluation of residual impacts. This deferral of crucial information to post-consent phases is procedurally unacceptable, contradicting the intent of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation are clearly identified prior to determination.

There are also notable evidential deficiencies, with gaps in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. This generates uncertainty about the scale and significance of impacts, particularly when negligible or non-significant effects are claimed without adequate supporting data. The lack of sufficient information obstructs a clear comprehension of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory obligations.

Consequently, the application does not fulfil the evidential threshold stipulated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate alignment with National Planning Framework 4, specifically its requirements 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 reliance on an ambiguous design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and robust assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The application submitted does not satisfy the necessary requirements of the Environmental Impact Assessment regime and the National Planning Framework 4 due to significant deficiencies in the assessment of marine ecology and protected species.

This inadequacy stems from the failure to fully identify and assess the presence and behaviour of ecological receptors within the West Lewis coastal environment, a region known for its biological activity and sensitivity. The baseline data provided is incomplete, and the methodologies employed do not accurately reflect species presence, behaviour, and habitat use.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage assessment provided is fundamentally inadequate, failing to acknowledge the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts a limited perspective, viewing heritage merely as a collection of isolated, static assets, neglecting their ongoing social, cultural, and spiritual significance to the community.

A serious shortcoming of this assessment is its treatment of culturally important sites,

including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites of burial and spiritual practice. However, they are classified as static features within the assessment, which overlooks their continued relevance, usage, and the potential impact that development may have on their surroundings. This mischaracterisation leads to an incomplete evaluation of the cultural ramifications and disregards the cemeteries' essential role in community life.

The proposal also neglects intangible cultural heritage, such as the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These components are vital to the area's identity but have been omitted from the assessment, creating a significant gap. The cultural impact of the development cannot be accurately understood without considering these essential elements.

Moreover, there are substantial concerns related to community rights and engagement. The Gaelic-speaking population, recognised as possessing a distinct cultural identity akin to that of Indigenous Peoples, has not been afforded the opportunity for Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to adhere to established principles concerning participation in decisions impacting cultural and environmental interests.

A critical procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot fulfil its legal obligation to assess the social, cultural, and economic repercussions on the island community. This significant omission renders any determination unlawful.

From a policy standpoint, these shortcomings place the application at odds with the National Planning Framework 4, particularly regarding the protection of historic assets and spaces. The neglect of both tangible and intangible heritage, as well as the failure to acknowledge living cultural practices, signifies a clear divergence from policy requirements.

Overall, the inability to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a considerable evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a sound basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of disclosure regarding the full Social Impact Assessment is a material deficiency that fundamentally undermines the evaluation of social impacts, health, and wellbeing associated with the proposed development. Although the developer engaged in a Social Impact Assessment and conducted focus groups with local residents, the comprehensive report has not been made public. This gap in evidence obstructs both public insight and the ability of the competent authority to comprehend the full extent of social risks highlighted by the developer's own findings.

Summaries that are available suggest that local residents are already facing discernible levels of stress, anxiety, and concern due to the scale and proximity of the development proposal. These documented impacts stem from direct engagement with the community and are therefore not speculative in nature. However, the absence of the complete assessment stifles thorough scrutiny of these findings and diminishes the capacity to weigh their significance in the decision-making process.

Moreover, there is substantial indication that the proposal threatens the very identity and cohesion of the community, with the potential for "cultural loss" identified within the developer's findings. Regrettably, these critical impacts have not been sufficiently incorporated into the main application or given the requisite importance. The failure to release the full Social Impact Assessment thus obscures the true human and social costs that the development may impose.

This lack of transparency also detrimentally affects the Environmental Impact Assessment process. It is vital to fully comprehend the social, economic, and health repercussions of developments of this magnitude, particularly when community character and functionality stand to be impacted. By withholding the complete dataset, the application fails to furnish a comprehensive evidential foundation essential for evaluating the balance between benefits and detriments.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 in terms of health and wellbeing. Development proposals must foster positive health outcomes and mitigate harm; however, the evidence presented indicates existing adverse effects that remain inadequately disclosed. Without access to the complete assessment, it is impossible to affirm compliance with this policy.

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

In summary, the non-disclosure of the full Social Impact Assessment, in conjunction with evidence of existing adverse impacts, renders the assessment both incomplete and unreliable. This deficiency precludes a lawful determination and underscores that the application lacks the requisite supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, seascape, and landscape impacts is fundamentally flawed, failing to adequately capture the scale of change and the sensitivity of the environment. The coastline of West Lewis is characterised by its expansive Atlantic view, its undeveloped nature, and a profound sense of remoteness. The proposed large-scale turbines, situated near the shoreline, would create a continuous industrial presence that would fundamentally alter this character, leading to a permanent and irreversible

change in the landscape.

Moreover, the application does not sufficiently illustrate the extent of the visual change. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal spots, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment inadequately conveys the significance of these impacts in light of the area's sensitive landscape.

There are serious methodological issues concerning the choice and representation of visual viewpoints. Evidence indicates that these viewpoints may not fully capture the most sensitive receptors or the worst-case scenarios, particularly regarding key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact has been understated, thereby compromising the assessment's reliability.

Another critical deficiency lies in the lack of evaluation of the interconnected relationship between seascape, landscape, and cultural heritage. Notably, the Calanais Standing Stones and other Scheduled Monuments are situated within a broader landscape linked to the Atlantic horizon by visual and spatial connections. The assessment treats these assets as isolated, ignoring their interdependence and leading to an incomplete assessment of the impacts on their setting and cultural importance.

The industrialisation of the seascape would sever these vital connections, altering how heritage assets are perceived and disrupting their relationship with the natural horizon. This constitutes not only a visual impact but also a significant cultural and spatial detriment that has not been adequately addressed in the application.

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

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the resultant changes are fundamental and permanent, rather than being reducible to acceptable levels through mitigation.

In summary, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings preclude a reliable evaluation and strongly affirm that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves substantial seabed preparation and installation works within a high-energy Atlantic environment. However, the assessment of construction and pollution risks remains incomplete, lacking the detail necessary to evaluate the likely environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures to be formulated post-consent, which obstructs any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is particularly concerning due to the sensitivity of the receiving environment. The West Lewis coastline, known for its clean coastal waters and important habitats, is vulnerable to sediment disturbance and contamination. Although the application acknowledges risks, such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

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

The absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application hinders the evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risk and diminishes the capacity of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures are assessed before consent is granted; the absence of such information means a lawful determination cannot be achieved. The application further fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal presents a concerning lack of evidence regarding the displacement of fishing activities, raising doubts about the assessment's validity. It assumes that existing fishing operations can be moved without consequences, yet fails to demonstrate the availability or accessibility of alternative fishing grounds. This

oversight is particularly troubling as it could lead to overfishing in other areas and have broader economic repercussions for the local fishing fleet. The absence of a clear, evidence-based evaluation means that the potential impacts on fisheries and the livelihoods dependent on them remain poorly understood.

Moreover, the risks posed to marine species are significant, particularly due to the underwater noise generated during the construction phase. The high-energy hammer piling anticipated over an extended period is likely to disturb marine life over considerable distances, notably impacting populations such as dolphins. The application appears to downplay the predicted disturbance to a substantial proportion of the local bottlenose dolphin population, raising serious concerns that are not sufficiently supported by evidence.

There is also a noticeable inconsistency within the application regarding the need for licences to harm European Protected Species. While it acknowledges this requirement, it simultaneously claims that the impacts are negligible. Such contradictions undermine the credibility of the assessment and call into question compliance with the Habitats Regulations, especially when anticipated harm necessitates legal authorisation.

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

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the proposed development can coexist with existing marine users or avoid unacceptable effects on marine biodiversity, thus precluding any conclusion of sustainable development.

In summary, the assessment is marked by a lack of evidence concerning fishing displacement, an underestimation of acoustic impacts, and internal inconsistencies. These deficiencies collectively render the assessment incomplete and unreliable, hindering a thorough evaluation of the implications for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application does not adequately address concerns regarding carbon balance. Disturbance of peatland releases stored carbon, which could lead to a carbon debt that contradicts the principles of renewable energy development. There is insufficient information to confirm that the overall carbon balance remains beneficial, creating a significant oversight.

The routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is no evidence presented to indicate that the

necessary consents or processes have been initiated, which calls into question the deliverability and lawful implementation of the project.

The assessment of onshore infrastructure is materially incomplete and does not fully consider the impacts arising from what is essentially a single integrated project. While the offshore turbines and onshore works are intrinsically linked, they are assessed separately, leading to a fragmented approach that conceals the true scale of environmental and socio-economic effects.

Onshore elements encompass cabling across protected moorland, construction of a substation near Stornoway, and associated access infrastructure through sensitive landscapes. These works involve excavation across areas of deep peat, especially within Barvas Moor, which is both a significant carbon store and an ecologically sensitive habitat. The lack of a comprehensive assessment of these impacts impedes a full understanding of the project's overall environmental footprint.

By excluding or deferring the assessment of onshore impacts, the application inhibits a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered together. The current separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are not fully understood.

There are considerable risks to sensitive habitats, including machair systems and peatland environments, which are subject to policy protection. The application fails to demonstrate that these impacts have been thoroughly assessed or that appropriate avoidance measures have been implemented, resulting in a clear evidential gap in biodiversity protection.

From a policy perspective, the lack of an integrated assessment of the project and the failure to demonstrate the protection of peatlands, habitats, and land use interests conflict with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further undermines the integrity of the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed development introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon. This alteration fundamentally changes the night-time environment along the West Lewis coastline, which is characterised by exceptionally dark skies that are essential to the area's environmental quality, cultural identity, and tourism value. However, the assessment of dark skies and their impact on nocturnal wildlife has been entirely

omitted from the Environmental Impact Assessment, representing a significant gap in the evaluation process.

The application fails to evaluate how this lighting affects visual amenity, landscape character, and the experiences of both residents and visitors. Given the importance of dark skies to the local identity and the growing astro-tourism sector, this omission is critical. Additionally, there is no analysis of the potential impacts on nocturnal wildlife, particularly species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are highly sensitive to artificial lighting. The absence of a lighting impact assessment or a phototaxis study means that the effects of aviation lighting on these species, including the risk of disorientation and increased mortality, have not been considered.

Moreover, the ornithological assessment relies solely on daytime survey data, neglecting nocturnal activity and the associated risks. Species like Kittiwakes, which may forage or migrate at night, could also be affected by artificial lighting, but this risk remains unassessed. The lack of site-specific night-time data creates a significant shortcoming in understanding ecological impacts.

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

From a policy standpoint, this omission is inconsistent with National Planning Framework 4 regarding the protection of natural places and environmental quality. It further undermines the comprehensive assessment of landscape and seascape impacts, as night-time character is a fundamental aspect of the environment.

Overall, the failure to assess dark skies and the impacts on nocturnal wildlife creates a considerable evidential gap. The application is incomplete due to the lack of baseline data, impact modelling, and species-specific analysis, rendering it incapable of supporting a lawful determination.

TOURISM

The application presents a proposal that significantly lacks a thorough assessment of tourism impacts, particularly in regard to the economic and social ramifications 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 it is stated that 86% of visitors are attracted by the scenery, the application does not provide a quantified analysis of how the introduction of large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution to the area.

In terms of economic significance, tourism has seen considerable growth, rising from

£65 million in 2017 to over £81.5 million, with the sector supporting more than 1,000 jobs and constituting as much as 16% of the island's economy. However, the application neglects to model the potential impacts on Tourism Gross Value Added and the wider economic resilience resulting from the industrialisation of the seascape and a decline in environmental quality. Without this critical analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or adversely affect an established and expanding sector.

Moreover, the assessment overlooks the crucial role of environmental quality in bolstering tourism, including the significance of unspoiled landscapes and dark skies for visitor experiences. This is particularly relevant for burgeoning markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates the shortcomings of the evaluation, leaving a notable gap in understanding the effects on this recognised and growing segment of the local economy.

Within the context of an island community that experiences limited economic diversification, the failure to evaluate tourism impacts carries broader implications for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been sufficiently examined, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4, especially concerning economic impact and the necessity to illustrate net benefit. Furthermore, it contradicts strategic objectives that designate tourism as a priority growth sector and fails to furnish adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

In summary, the collective deficiencies in quantifying tourism impacts, assessing the environmental drivers influencing visitor behaviour, and acknowledging the island's economic reliance culminate in a substantial evidential gap. This lack of comprehensive evaluation significantly hampers the ability to assess the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm exemplifies a significant failure to meet the requirements for sustainable development as defined by statutory duties, national policy, and evidential standards. It mirrors the primary issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being submitted under a more stringent policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application remains deficient.

There are substantial gaps in the evidential basis for determination, including incomplete baseline data, the use of an ambiguous design envelope, and unclarified mitigation measures. Additionally, vital impact pathways concerning nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects have been overlooked.

Consequently, the Environmental Impact Assessment is insufficient and fails to provide a complete understanding of potential significant effects or residual impacts.

Procedural failures are also evident. The lack of a compliant Island Communities Impact Assessment constitutes a breach of the Islands (Scotland) Act 2018, while the failure to disclose the full Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, the proposal stands in direct contradiction to National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage, nor does it show that health and wellbeing impacts are acceptable. There is also a failure to prove a net economic benefit owing to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been properly assessed, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

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

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

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

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

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: 596BB560

Member of the public 961

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under marine licensing and Environmental Impact Assessment regulations. It is informed by a thorough review of the Environmental Impact Assessment Report and related documentation, which reveals significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The dimensions and design of the project, alongside its proximity to the shore, raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application does not present a sufficient evidential basis to support a lawful determination. Essential environmental data is absent, baseline information is scarce and inconsistent, and critical elements of the proposal remain unspecified. The flexible design framework complicates the understanding of potential significant effects, and the reliance on unconfirmed mitigation measures renders their effectiveness unassessable. Consequently, the submitted documentation does not allow for a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidential support.

There exist notable and serious policy conflicts. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It fails to establish that it can meet national obligations to safeguard biodiversity, climate priorities, and environmental integrity. These discrepancies directly affect the statutory assessments required for consent and hinder the competent authority's capacity to deem the development acceptable in policy terms.

The unprecedented scale of the project in this area, with substantial turbines placed in close proximity to the shoreline, raises significant concerns about landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy violations indicates that the application is incomplete and cannot sustain a lawful determination. Under these conditions, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency, failing to provide a reliable account of the anticipated environmental effects of the proposal. The reliance on a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This lack of specificity undermines the integrity of the assessment and means that the reported impacts may not accurately reflect the final development, thus preventing both the public and the competent authority from fully understanding the actual environmental effects.

The application is heavily dependent on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the basis that environmental harm will be mitigated at a later stage hinders any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which necessitates clear establishment of likely significant effects and mitigation prior to determination.

There are substantial evidential deficiencies in the report, including gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. These shortcomings result in uncertainties regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that are incompatible with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated under the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This necessitates the application of the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not comply with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the combination of reliance on an undefined design envelope, absence of specified mitigation strategies, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies preclude a lawful and robust assessment of environmental effects, meaning that the competent authority is not adequately equipped to make a determination based on the information presented.

ASSESSMENT OF ALTERNATIVES

The inadequacy in the assessment of alternatives is a critical issue that highlights the application's failure to meet the statutory requirements of the Environmental Impact Assessment regime. It does not provide a structured and reasoned comparison of viable alternatives based on their environmental effects, instead offering a narrative

detailing the project's evolution. This narrative approach does not sufficiently show that less harmful options have been properly identified, assessed, and prioritised over more damaging solutions.

The lack of a transparent, evidence-based comparison of alternative offshore locations, development scales, or design configurations is concerning. Notably, the application does not indicate that the developer has seriously considered positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. Considering the sensitivity of the West Lewis coastline and the critical role that proximity to the shore plays in determining impact, this omission prevents any conclusion that the proposed siting is the least damaging option available.

These deficiencies also extend to the cable routing and landfall assessments, which lack sufficient evidence of properly explored alternative routes to avoid or minimise impacts on sensitive receptors. Areas of cultural and spiritual significance, such as Barvas Cemetery, are particularly affected. The absence of a clear avoidance strategy, coupled with a lack of comparative analysis, indicates that mitigation by design has not been effectively applied, resulting in an overreliance on post-design mitigation measures.

Consequently, the application fails to demonstrate that environmental harm has been adequately minimised through site selection, layout, and infrastructure routing. This represents a significant deviation from the established mitigation hierarchy, hindering the competent authority's ability to ascertain whether less harmful and more suitable alternatives exist. The absence of a robust alternatives assessment calls into question whether the proposal represents a sustainable and policy-compliant solution.

From a policy perspective, this deficiency undermines adherence to National Planning Framework 4, particularly with regard to the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a material omission that leads to the overarching conclusion that the application has not undergone sufficient evaluation and cannot warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species associated with the proposed application is fundamentally flawed, failing to deliver a comprehensive or accurate representation of ecological receptors in the West Lewis coastal area. This environment is notably sensitive and biologically rich, yet the baseline data presented is inadequate, and the methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of species. Consequently, the assessment lacks a reliable evidential basis for the evaluation of potential impacts.

Notably, the assessment overlooks otters, classified as a European Protected Species, neglecting to adequately recognise and evaluate their active use of coastal regions for foraging and movement. The omission of their core foraging range and behavioural

characteristics leads to a failure in adequately assessing the potential impacts of construction activities, noise, and increased human presence. This shortcoming fundamentally undermines the conclusions regarding the significance of effects on this species.

Additionally, the assessment of basking sharks is deficient, as it relies heavily on aerial surveys that are prone to significant detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate their presence, especially when compared with well-documented land-based observations that indicate frequent utilisation of these waters. The oversight in incorporating or appropriately considering this data contributes to an incomplete baseline, thus diminishing the reliability of the conclusions drawn.

The methodological inadequacies result in findings of negligible or non-significant effects being premised on assumptions rather than substantiated evidence. The lack of sufficient baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the actual level of risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not satisfy the stipulations of the Environmental Impact Assessment framework and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty generated by this inadequate assessment precludes the exclusion of adverse effects beyond reasonable scientific doubt, thereby activating the precautionary principle. Under such circumstances, the granting of consent is not legally permissible.

In summary, the combination of incomplete baseline data, ineffective methodologies, and unsubstantiated conclusions renders the assessment unreliable. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species and culminate in the assertion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant gaps in evidence and internal inconsistencies, rendering its conclusions unreliable. 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 meet the necessary evidential standards to demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are located near the proposed development, yet the assessment does not adequately evaluate the implications of potential displacement, collision risk, or habitat loss.

There exists a fundamental contradiction within the application, as the developer claims no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only warranted if 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 provided. The assessment lacks sufficient proof 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 thoroughly considered, and the reliance on modelling approaches adds uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. The methodologies used likely underestimate mortality rates, especially when baseline data is incomplete and behavioural responses are not fully understood.

The positioning of turbines within a recognised migratory corridor introduces additional risks, effectively creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term effects 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 fulfil the evidential threshold necessary to conclude that there would be no adverse effect on the integrity of protected sites. The presence of contradictory findings, along with data gaps and modelling limitations, means that the standard of beyond reasonable scientific doubt has not been reached. This invokes the precautionary principle and inhibits a lawful conclusion in favour of consent. Furthermore, the identified deficiencies signify non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected puts the proposal directly at odds with national policy.

In summary, the assessment is fundamentally flawed due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These deficiencies hinder a thorough evaluation of impacts and lead to the conclusion that the application does not meet the statutory requirements essential 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 failure to disclose the complete Social Impact Assessment fundamentally undermines the assessment of social impacts, health, and wellbeing, leaving it materially deficient and lacking the necessary transparency for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This represents a significant evidential gap, impeding both public understanding and the competent authority's ability to grasp the full extent of the social risks identified in the developer’s own research.

Available summaries reveal that residents are currently facing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposed development. These effects are based on direct engagement with the community and are therefore not speculative in nature. However, the non-disclosure of the full

assessment restricts proper scrutiny of these findings and limits the assessment of their significance in the decision-making process.

Furthermore, there is evidence suggesting that the proposal poses a direct threat to community identity and cohesion, with “cultural loss” identified as an issue within the developer’s own findings. Nonetheless, these concerns have not been adequately integrated into 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 lack of transparency has serious implications for the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially when the character and functioning of the community may be at stake. The failure to provide the full dataset results in an incomplete evidential basis for assessing the balance between the proposed benefits and potential harm.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 concerning health and wellbeing. Development is required to support positive health outcomes and mitigate harm. However, the evidence available indicates existing adverse effects that have not been fully disclosed. Without access to the complete assessment, it is impossible to demonstrate compliance with this policy.

The procedural ramifications are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment, marking a material omission within the application and a failure to satisfy the evidential requirements set forth by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

The visual change resulting from the turbines would be substantial, dominating views from residential areas, historic sites, and popular coastal locations. This would

adversely affect visual amenity and degrade the essential qualities of naturalness and remoteness. The assessment does not adequately convey the magnitude of this impact or its significance within such a sensitive landscape.

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

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

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

From a policy standpoint, this proposal contradicts the directives of National Planning Framework 4, which aims to protect natural spaces and historic assets. The extent of change posed by the development is incompatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case scenario analysis further undermines any claims of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure that their presence is dominant and unavoidable. Consequently, the changes brought about by this proposal are fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation.

Overall, the assessment fails to accurately depict the extent of impact, the sensitivity of the environment, and the interrelated nature of landscape and heritage. These deficiencies hinder a reliable evaluation and highlight that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is notably deficient, lacking the necessary detail to adequately evaluate the likely environmental impacts. The proposed development entails extensive seabed preparation and installation activities within a high-energy Atlantic environment. However, the application fails to present

fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that are to be formulated after consent, which inhibits a meaningful evaluation of their sufficiency or effectiveness.

This reliance on undefined measures is particularly alarming considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are susceptible to sediment disruption and pollution. While the application acknowledges the risks associated with sediment mobilisation and potential chemical or oil spills, it lacks sufficient detail regarding the prevention, control, or monitoring of these risks.

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

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent has been granted, the application obstructs the evaluation of whether adequate safeguards are established to address pollution incidents. This creates procedural risks and diminishes the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contravenes the stipulations of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to consent, and in the absence of such information, a lawful determination cannot occur. Additionally, the application does not demonstrate adherence to policy requirements regarding environmental protection and water quality.

In conclusion, the combination of undefined mitigation measures, the absence of comprehensive management plans, and the uncertainty surrounding potential impacts culminate in a materially deficient assessment. These inadequacies hinder a robust evaluation of construction and pollution risks and reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, both of which are at risk from the proposed development. The application fails to provide a thorough evaluation of the ecological and socio-economic impacts, particularly regarding fisheries and marine life. A key concern is the assumption that fishing activities can be displaced without adverse consequences. There is no evidence presented that alternative fishing grounds are available,

accessible, or capable of absorbing any additional pressure. This is a critical omission, as it raises the potential for overfishing in other areas, which could have detrimental economic effects on the local fishing fleet. Without a robust and evidence-based assessment, it is impossible to fully understand the implications for fisheries and the livelihoods dependent on them.

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 for an extended period is likely to disturb marine life over large distances, notably affecting local species such as dolphins. The application underestimates the impact on a considerable portion of the local bottlenose dolphin population, raising serious concerns, yet it fails to provide sufficient evidence to support its conclusions regarding these effects.

There are clear inconsistencies within the application, as it acknowledges 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 serious concerns regarding compliance with the Habitats Regulations, especially where potential harm necessitates legal authorisation.

Furthermore, the assessment overlooks cumulative impacts arising 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 determine the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The onshore works associated with this project include cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure that traverses sensitive landscapes. These activities will require excavation in areas of deep peat, especially within Barvas Moor, which is both a vital carbon store and an ecologically sensitive area. The failure to provide a thorough assessment of these impacts prevents a clear understanding of the overall environmental footprint of the project.

The assessment of onshore infrastructure is materially incomplete and does not consider the full extent of impacts from what is a single integrated project. The offshore turbines and onshore components are interconnected; however, they are evaluated separately. This fragmented approach obscures the true scale of environmental and socio-economic effects, as excluding or deferring the assessment of onshore impacts hinders the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be assessed together, yet the separation of onshore and offshore elements means that the combined impacts on peatlands, habitats, and communities remain inadequately understood.

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

Moreover, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application fails to provide evidence that the necessary consents or processes have been initiated, which casts doubt on the project's deliverability and lawful implementation.

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

In summary, the separation of project components, the absence of comprehensive assessments, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, ultimately obstructing a lawful determination. The proposal also raises concerns about carbon balance, as disturbance of peatland results in the release of stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this issue or prove that the overall carbon balance is beneficial.

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. The proposal, however, introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. This change poses significant concerns for both residents and visitors, yet the application fails to assess the impact of this lighting on visual amenity, landscape character, or the overall experience in the area.

Moreover, the application does not evaluate the impacts on nocturnal wildlife,

specifically species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are highly sensitive to artificial lighting due to phototaxis. This sensitivity can lead to disorientation and increased risk of collision. The absence of a lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species, including possible increases in mortality, remain unexamined.

Compounding these concerns is the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity or the associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this vulnerability has not been assessed. Without site-specific night-time data, there is a critical gap in understanding the ecological impacts of the proposal.

The lack of assessment regarding nocturnal impacts prevents a determination of whether protected species or designated sites could be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt has not been met, thereby engaging the precautionary principle and obstructing a lawful determination.

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

In summary, the complete lack of assessment related to dark skies and nocturnal wildlife creates a significant evidential gap. The application is rendered incomplete and insufficient to support a lawful determination due to the absence of baseline data, impact modelling, and species-specific analysis.

TOURISM

The assessment of tourism impacts associated with the proposed development is seriously lacking and does not adequately evaluate the economic and social implications for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and a sense of remoteness. Although the application notes that 86% of visitors are attracted by scenery, it fails to provide any quantified evaluation of how large-scale offshore infrastructure might influence 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, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nonetheless, the application does not consider how the industrialisation of the seascape and the resultant loss of environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the island. Without such critical analysis, it remains uncertain whether the development would

yield a net economic benefit or adversely affect an established and expanding sector.

The lack of consideration for the role of environmental quality in fostering tourism is a glaring omission, particularly the significance of unspoiled landscapes and dark skies to visitor experience and emerging markets like nature-based tourism and astro-tourism. Furthermore, the absence of a Dark Skies Assessment exacerbates this shortcoming, leaving a considerable void in understanding the potential impacts on a recognised and burgeoning segment of the local economy.

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

From a policy standpoint, the application does not illustrate compliance with the National Planning Framework 4, especially concerning economic impact and the necessity to demonstrate net benefit. It also contradicts strategic objectives that identify tourism as a priority growth sector and lacks sufficient evidence for the competent authority to properly 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 significant evidential gap. This deficiency hampers a comprehensive evaluation of the economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm raises significant concerns regarding sustainable development and does not meet the necessary statutory duties. It mirrors the issues that caused the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. Despite being submitted under a more stringent policy framework that emphasises biodiversity and community wellbeing, it fails to provide a comprehensive evidential basis for assessment.

Critical gaps in baseline data and reliance on an undefined design envelope undermine the application. There are also unspecified mitigation measures and significant omissions, such as impacts on nocturnal wildlife, full onshore infrastructure, and tourism effects. The Environmental Impact Assessment remains incomplete, hindering a thorough understanding of significant effects and residual impacts.

Additionally, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment violates the Islands (Scotland) Act 2018, and the non-disclosure of the full Social Impact Assessment is a substantial omission. These issues prevent the competent authority from effectively evaluating impacts on community wellbeing and cultural identity, making the application unsuitable for

determination.

The proposal contradicts National Planning Framework 4, failing to safeguard biodiversity, natural places, and cultural heritage. It does not demonstrate acceptable health and wellbeing impacts and lacks evidence of a net economic benefit due to inadequate tourism impact modelling. The cumulative impact of both offshore and onshore elements has not been properly evaluated, complicating assessments related to peatlands, carbon balance, and crofting land.

The environmental risks associated with this proposal are uncertain and potentially significant. Evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The application does not meet the evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt, thereby activating the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

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

In conclusion, the application is procedurally and substantively unfit for determination. The breadth of information deficiencies, coupled with policy inconsistencies and unresolved environmental risks, obstructs a lawful, evidence-based decision. It is essential for the competent authority to refuse consent for the Spiorad na Mara Offshore Wind Farm application or require the submission of the missing information.

Additional Comments

Although i do not live here,my own area in West Wales,is also threatened by these huge wind farm.It horrifies me that there is little forethought in any of these schemes OK

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: 5F79B21C

Member of the public 962

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection is grounded in a thorough review of the Environmental Impact Assessment Report and accompanying documentation, revealing significant deficiencies related to planning, environmental considerations, cultural implications, and procedural adherence. The development is set to be located off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine natural environment, and rich cultural heritage. Concerns arise regarding the scale, proximity, and design of the wind farm, which raise fundamental questions about its alignment with statutory requirements, national policy, and the principles underpinning sustainable development.

The application lacks an adequate evidential foundation for a lawful determination. Critical environmental data is absent, baseline information is both limited and inconsistent, and numerous aspects of the proposal are left undefined. The reliance on a flexible design framework obstructs a clear understanding of potential significant effects, and the dependence on unspecified mitigation measures means that their effectiveness remains unassessed. Consequently, the documentation falls short of providing a comprehensive or informed perspective on the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are unsupported by robust evidence.

Moreover, there are evident and substantive policy inconsistencies. The proposal appears to conflict with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. It fails to establish that national obligations to safeguard biodiversity, climate interests, and environmental integrity can be fulfilled. These inconsistencies directly challenge the statutory tests necessary for consent and jeopardise the ability of the relevant authority to determine that the development aligns with policy criteria.

The scale of the project is unprecedented for this area, with large turbines to be located in close proximity to the shoreline, which raises substantial concerns regarding landscape capacity, visual impact, and environmental ramifications. Collectively, the lack of adequate information, the reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary completeness and transparency, failing to provide a reliable assessment of the likely environmental effects of the proposed development. By employing a flexible Project Design Envelope without committing to specific turbine dimensions, layouts, or configurations, the application introduces considerable uncertainty. This approach compromises the integrity of the assessment, as it does not allow for a consistent application of a worst-case scenario. Consequently, the impacts presented may not accurately represent the actual development, which hinders both public understanding and the ability of the competent authority to gauge the true extent of environmental effects.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that are yet to be defined. This reliance implies that consent is sought with the expectation that environmental harm will be addressed at a later stage, obstructing any meaningful evaluation of effectiveness or assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally unacceptable and contravenes the objectives of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation strategies are clearly established before a determination is made.

Additionally, there are marked deficiencies in evidence, including gaps in baseline data and methodological limitations, alongside an overreliance on assumptions rather than site-specific evidence. This results in uncertainty surrounding the scale and significance of impacts, particularly where negligible or non-significant effects are claimed without robust supporting data. The lack of adequate information impedes a comprehensive understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not meet the evidential threshold mandated by the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. The precautionary principle is especially pertinent in relation to protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, specifically regarding biodiversity protection and environmental integrity, as it cannot be substantiated that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, unspecified mitigation strategies, and insufficient baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority ill-equipped to make a decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks the necessary comprehensiveness and reliability to accurately reflect the ecological receptors within the West Lewis coastal environment. This area is known for its biological activity and sensitivity, yet the available baseline data is insufficient, and the methodologies

employed do not effectively document species presence, behaviour, and habitat use. Consequently, the assessment fails to deliver a credible evidential basis for evaluating potential impacts.

One significant shortfall is related to otters, a European Protected Species. The application neglects to adequately recognise and evaluate their active utilisation of coastal regions for both foraging and movement. Without a proper understanding of their core foraging areas and behavioural patterns, the assessment does not sufficiently address the possible effects of construction-related disturbances, noise, and increased human activity. This oversight compromises the assessment's conclusions regarding the lack of significant effects on otters.

Additionally, the evaluation of basking sharks is flawed due to an over-reliance on aerial surveys, which introduces a substantial detection bias, particularly in the Atlantic's environmental conditions. This method is likely to result in an underestimation of the sharks' presence, especially when compared to established observations from land that show frequent use of these waters. The failure to incorporate or adequately consider this crucial data leads to an incomplete understanding of the baseline and diminishes the reliability of the findings presented.

These methodological shortcomings indicate that conclusions claiming negligible or non-significant effects are grounded in assumptions rather than solid evidence. The lack of adequate baseline data hampers the ability to meaningfully assess cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the actual level of risk posed to marine species and habitats.

From a regulatory viewpoint, the application does not comply with the standards set by the Environmental Impact Assessment regime and the National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced by these deficiencies prevents the elimination of adverse effects beyond reasonable scientific doubt, invoking the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions leads to an unreliable assessment. These issues hinder a robust evaluation of the impacts on marine ecology and protected species, ultimately demonstrating that the application does not possess a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development presents significant deficiencies, rendering it unreliable. It fails to demonstrate adequately, to the necessary evidential standard, that internationally important seabird populations on the west coast of the Isle of Lewis will not be adversely affected. Many of these species are already in decline, and the development is situated within crucial foraging areas and migratory pathways. The implications of displacement, collision risk, and habitat loss are not

rigorously evaluated, which undermines the overall conclusions of the assessment.

A key inconsistency within the application arises from the developer's conclusion of no significant adverse effects, which contradicts the advancement of a Habitats Regulations derogation case, typically necessitated only in instances where significant harm is anticipated. This contradiction raises serious concerns about the reliability of the assessment, suggesting that the conclusions drawn lack adequate supporting evidence. The assessment does not convincingly demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds has not been fully considered, and reliance on modelling approaches introduces uncertainty, particularly for species experiencing severe declines, including Kittiwakes and Fulmars. Methodologies employed are likely to underestimate mortality rates due to incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines within an established migratory corridor poses an additional, significant risk, as it creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not sufficiently evaluate the long-term effects of sustained mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application fails to meet the evidential threshold required to ascertain no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, in conjunction with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, which impedes a lawful conclusion in favour of consent. Furthermore, the identified deficiencies illustrate non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to substantiate that internationally significant seabird populations will remain unaffected directly conflicts with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the cultural heritage along the West Lewis coastline is seriously lacking. It fails to recognise this area as a living cultural landscape, where the environment, language, tradition, and community are deeply intertwined. The application adopts a simplistic view, treating heritage merely as a collection of isolated, unchanging assets, rather than understanding their dynamic social, cultural, and spiritual roles within the community.

A major shortcoming is the treatment of culturally significant sites such as the

cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial sites and places for spiritual practices, but the assessment categorises them as static features. This approach neglects their ongoing use and meaning, as well as the potential impacts of development on their surroundings. As a result, the evaluation of cultural effects is incomplete and does not reflect their importance in community life.

Moreover, the application overlooks intangible aspects of cultural heritage, including the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These aspects are crucial to the area's identity, yet they are absent from the assessment, representing a significant oversight. Without addressing these factors, the true cultural impact of the development remains unclear.

There are additional issues regarding community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity that aligns with characteristics of an Indigenous People. However, no Free, Prior and Informed Consent process has been undertaken. This lack of meaningful engagement undermines the credibility of the assessment and does not reflect the established principles of participation in decisions that affect cultural and environmental interests.

A significant procedural error is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal in direct conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The disregard for both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, signifies a clear deviation from policy standards.

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and adherence to statutory requirements creates a substantial evidential gap. The cultural impacts of the development have not been thoroughly examined, and the application lacks a solid foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of disclosure regarding the full Social Impact Assessment is a material deficiency that fundamentally undermines the evaluation of social impacts, health, and wellbeing associated with the proposed development. Although the developer engaged in a Social Impact Assessment and conducted focus groups with local residents, the comprehensive report has not been made public. This gap in evidence obstructs both public insight and the ability of the competent authority to comprehend the full extent of social risks highlighted by the developer's own findings.

Summaries that are available suggest that local residents are already facing discernible levels of stress, anxiety, and concern due to the scale and proximity of the development proposal. These documented impacts stem from direct engagement with the community and are therefore not speculative in nature. However, the absence of the complete assessment stifles thorough scrutiny of these findings and diminishes the capacity to weigh their significance in the decision-making process.

Moreover, there is substantial indication that the proposal threatens the very identity and cohesion of the community, with the potential for "cultural loss" identified within the developer's findings. Regrettably, these critical impacts have not been sufficiently incorporated into the main application or given the requisite importance. The failure to release the full Social Impact Assessment thus obscures the true human and social costs that the development may impose.

This lack of transparency also detrimentally affects the Environmental Impact Assessment process. It is vital to fully comprehend the social, economic, and health repercussions of developments of this magnitude, particularly when community character and functionality stand to be impacted. By withholding the complete dataset, the application fails to furnish a comprehensive evidential foundation essential for evaluating the balance between benefits and detriments.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 in terms of health and wellbeing. Development proposals must foster positive health outcomes and mitigate harm; however, the evidence presented indicates existing adverse effects that remain inadequately disclosed. Without access to the complete assessment, it is impossible to affirm compliance with this policy.

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

In summary, the non-disclosure of the full Social Impact Assessment, in conjunction with evidence of existing adverse impacts, renders the assessment both incomplete and unreliable. This deficiency precludes a lawful determination and underscores that the application lacks the requisite supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts on the seascape, landscape, and cultural heritage is insufficient and does not truly capture the extent of change or the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, which contribute to a strong sense of remoteness. Large-scale turbines placed near the shoreline would introduce a continuous industrial presence that would fundamentally change this character, leading to a permanent and

irreversible alteration of the landscape.

The application inadequately represents the scale of this visual change. Due to the size and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would have a direct impact on visual amenity and detract from the naturalness and sense of remoteness that define the area. The assessment does not accurately convey the significance of this impact within the context of such a sensitive landscape.

Methodological issues arise concerning the selection and presentation of visual viewpoints. There is evidence suggesting that these viewpoints might not adequately reflect the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and high-value landscapes. This raises concerns that the scale of visual impact may have been understated, which calls the reliability of the assessment into question.

Additionally, there is a failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape linked by visual and spatial relationships to the Atlantic horizon. Treating these heritage assets as isolated rather than interdependent results in a poor assessment of impacts on their setting and cultural significance.

The introduction of industrial elements to 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 issue but also broader cultural and spatial harm that has not been sufficiently analysed within the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4, which aims to protect natural spaces and historic assets. The extent of change is at odds with the requirement to maintain 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.

Moreover, the impacts outlined cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be prominent and inescapable. Consequently, the change would be fundamental and permanent, and not something that could be reduced to an acceptable level through mitigation efforts.

Overall, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and underscore the conclusion that the proposal is incompatible with the protection 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 waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry, yet the application related to this development lacks a

thorough assessment of its ecological and socio-economic impacts. A critical flaw is the presumption that fishing activities can be relocated without repercussions. There is no evidence presented that alternative fishing grounds are available, easily accessible, or capable of withstanding additional fishing pressure. This significant gap raises concerns over potential overfishing in other areas, which could adversely affect the local fishing fleet's economic stability. The absence of a clear, evidence-based evaluation makes it impossible to fully understand the implications for fisheries and local livelihoods.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise produced during construction activities. The use of high-energy hammer piling for prolonged periods is expected to disturb marine life across extensive areas, impacting species such as dolphins. The predicted disturbance to a considerable portion of the local bottlenose dolphin population is alarming, yet the application minimises these concerns without adequate supporting evidence.

Additionally, there is a notable inconsistency in the application regarding the need for licenses to permit harm to European Protected Species, which is acknowledged while simultaneously stating that the impacts are negligible. This contradiction undermines the assessment's credibility and raises compliance issues with the Habitats Regulations, particularly when anticipating harm that necessitates legal authorisation. The assessment further fails to consider cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive analysis of these compounded effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not align with the requirements of the National Planning Framework 4 or the National Marine Plan. It does not demonstrate how the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thus precluding any assertion that the proposal constitutes sustainable development. Collectively, the inadequacies surrounding evidence on fishing displacement, the underestimation of acoustic impacts, and the inconsistencies within the assessment highlight its incompleteness and unreliability, obstructing a thorough evaluation of the implications for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is incomplete and does not account for the full range of impacts related to this single integrated project. The offshore turbines and the onshore works are interconnected, yet they are evaluated separately. This fragmented approach obscures the true scale of both environmental and socio-economic effects.

Onshore components include cabling that crosses protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure through sensitive landscapes. This work involves excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and ecologically

sensitive habitat. The application lacks a comprehensive assessment of these impacts, which hinders a complete understanding of the project's overall environmental footprint.

Furthermore, by excluding or delaying the evaluation of onshore impacts, the application fails to allow for a proper examination of cumulative effects. The Environmental Impact Assessment process requires that all elements of a project are reviewed together. However, the separation of offshore and onshore components leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

There are also considerable risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not prove that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, resulting in a significant evidential gap concerning biodiversity protection.

Concerns regarding carbon balance are raised as well. The disturbance of peatland could release stored carbon, leading to a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this issue or demonstrate that the overall carbon balance remains beneficial.

Moreover, routing infrastructure through active croft land may introduce conflicts with current land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, which raises doubts about its deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of any assessment regarding nocturnal wildlife and dark skies represents a significant oversight in the Environmental Impact Assessment. The dark skies along the West Lewis coastline are crucial to the area's cultural identity, environmental quality, and tourism potential. The introduction of permanent red aviation lighting, which would be visible over long distances, threatens to create an intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

Furthermore, the application fails to evaluate the consequences of this lighting on

visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning as dark skies play a vital role in attracting emerging tourism sectors, such as astro-tourism. The omission of these critical impacts results in a substantial gap in the overall assessment of landscape and environmental factors.

Equally important is the lack of evaluation regarding the effects of artificial lighting on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial light, which can disorient them and increase their risk of collision. The application does not provide a lighting impact assessment or a phototaxis study, failing to address how aviation lighting could affect these species or contribute to increased mortality rates.

Additionally, reliance on daytime survey data in the ornithological assessment misses the nocturnal activities of species like Kittiwakes, which may forage or migrate at night and are equally at risk of disorientation from artificial lighting. The absence of site-specific night-time data creates a critical void in understanding the ecological impacts involved.

Without a thorough assessment of the effects on nocturnal wildlife, it is impossible to ascertain whether protected species or designated sites might be adversely affected. The evidential standard needed to demonstrate the absence of adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, these omissions clash with the National Planning Framework 4, which seeks to protect natural places and environmental quality. This oversight undermines the overall evaluation of landscape and seascape impacts, as the character of night-time forms an essential aspect of the environment.

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

TOURISM

The economic contribution of tourism to the Isle of Lewis is substantial, having risen 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 growth, the application fails to adequately assess how large-scale offshore infrastructure could alter visitor numbers, behaviour, or the overall economic contribution, leaving a critical gap in understanding the potential implications for this key sector.

Tourism relies heavily on the natural attributes of the area, including its wild coastline, near-pristine landscape, dark skies, and a sense of remoteness. The application acknowledges that 86% of visitors are attracted by scenery; however, it provides no

quantified analysis regarding the impact of potential industrialisation on the environmental quality that draws these visitors. The omission of an assessment addressing environmental quality, particularly concerning unspoiled landscapes and dark skies, is significant, especially as these factors are vital to the visitor experience and to emerging markets like nature-based tourism and astro-tourism.

In addition to the economic factors, the failure to conduct a compliant Island Communities Impact Assessment means that the vulnerabilities of the local economy have not been evaluated as mandated by the Islands (Scotland) Act 2018. This oversight has broader implications for community sustainability, local businesses, and employment opportunities within an island community that has limited economic diversification.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, especially regarding the need to establish net economic benefit and the strategic priority placed on tourism as a growth sector. Without sufficient evidence to allow the competent authority to fully assess the economic consequences of the proposal, there exists a significant evidential gap.

Overall, the combined shortcomings in quantifying tourism impacts, assessing the environmental drivers influencing visitor behaviour, and acknowledging the island's economic dependency lead to an incomplete application that hinders a thorough evaluation of its economic effects.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in its ability to meet the requirements of sustainable development when evaluated against statutory duties and national policy. This application reiterates the critical issues that led to the refusal of the Lewis Wind Power proposal in 2008, which was rejected due to the unacceptable scale of industrialisation. The current proposal is presented under a policy framework that places greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it fails to address these concerns adequately.

The evidential foundation for the application is incomplete and unreliable, with significant gaps in baseline data and an undefined design envelope. Furthermore, it relies on unspecified mitigation measures and neglects to consider crucial impact pathways, such as those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of potential significant effects and residual impacts.

There are evident procedural shortcomings as well. The lack of a compliant Island Communities Impact Assessment is a violation of statutory obligations under the Islands (Scotland) Act 2018, while the omission of the full Social Impact Assessment represents a significant failure. These inadequacies hinder the competent authority's

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

This proposal contravenes the National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. It also fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative impact of both offshore and onshore elements has not been properly assessed, which obscures the consequences for peatlands, carbon balance, habitats, and crofting land.

Furthermore, environmental risks associated with the proposal remain uncertain and potentially severe. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold needed to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, necessitating the application of the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

The proposed development would lead to significant and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the negative impacts on tourism are permanent consequences that cannot be effectively mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The magnitude of informational deficiencies, coupled with policy inconsistencies and unresolved environmental risks, precludes a lawful and evidence-based decision. Therefore, it is essential that the competent authority refuse consent for the Spiorad na Mara Offshore Wind Farm proposal in its entirety or invoke the relevant regulatory provisions to compel the submission of the missing information.

Additional Comments

I object to the proposed Spiorad na Mara wind farm. I have concerns about the environmental impacts of this development. Its scale and location risk damaging sensitive habitats, disturbing wildlife, and altering the natural landscape.

There are also concerns about potential effects on marine and coastal ecosystems, as well as the environmental impact when considered alongside other developments.

These issues could have lasting consequences for biodiversity and the health of the wider environment, which are highly valued by the local 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: 021F5C45

Member of the public 963

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 frameworks. My concerns arise from a thorough review of the Environmental Impact Assessment Report and the accompanying documentation, which reveal serious deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The proposed development is set to take place off the west side of the Isle of Lewis, a region celebrated for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. The scale and design of this proposal raise urgent questions about its adherence to statutory requirements, national policy, and the principles that underpin sustainable development.

The application lacks a sufficient evidential foundation necessary for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Key elements of the proposal remain undefined, with a flexible design framework inhibiting a clear understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures raises questions about their effectiveness, leaving the documentation inadequate for a comprehensive understanding of the environmental, cultural, or community impacts. Consequently, claims of negligible or non-significant effects lack robust supporting evidence.

Substantial policy conflicts are evident as well. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment requirements, or National Planning Framework 4. This inconsistency is particularly prominent concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. The application fails to prove that it meets national obligations for the protection of biodiversity, climate interests, and environmental integrity. These conflicts undermine the ability of the competent authority to assess the acceptability of the development within policy parameters.

The scale of this proposal is unprecedented for this area, with large turbines being positioned alarmingly close to the shoreline, thereby raising significant concerns about the landscape's capacity, visual impact, and overall environmental effects. When considered collectively, the lack of adequate information, dependence on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy all indicate that the application is incomplete and unfit for a lawful determination. Under these circumstances, it is imperative that the precautionary principle be applied.

ASSESSMENT OF ALTERNATIVES

The proposal under consideration presents significant shortcomings in the assessment of alternatives, failing to satisfy the statutory obligations of the Environmental Impact Assessment regime. Instead of offering a systematic and reasoned evaluation of realistic alternatives based on their environmental effects, the application merely recounts the project's evolution. This narrative fails to substantiate that less harmful options have been thoroughly identified, evaluated, and chosen over more damaging alternatives.

There is a conspicuous lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not illustrate that the developer has genuinely contemplated positioning the turbines further offshore, an action that could potentially mitigate visual, ecological, and coastal impacts. The West Lewis coastline is sensitive, and the critical significance of proximity to the shore in assessing impact underscores the necessity of such analysis. Without it, it is impossible to assert that the proposed siting is the least damaging option available.

Moreover, this inadequacy extends to the routing of cables and the assessment of landfall, where there is insufficient evidence to demonstrate that alternative routes have been adequately investigated to avoid or minimise harm to sensitive receptors, including culturally and spiritually significant locations like Barvas Cemetery. The absence of a clear avoidance strategy alongside a lack of comparative analysis suggests that the principle of mitigation by design has not been appropriately applied, leading to a reliance on post-design mitigation measures instead.

Consequently, the application does not convincingly establish 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, hindering the competent authority's ability to determine whether less harmful and more suitable alternatives exist. In the absence of a thorough assessment of alternatives, it cannot be affirmed that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, these deficiencies seriously undermine adherence to National Planning Framework 4, particularly concerning the safeguarding of natural environments, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission that leads to the conclusion that the application has not been sufficiently assessed and cannot be lawfully approved.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents significant deficiencies in the assessment of marine ecology and protected species, leading to an incomplete understanding of the ecological receptors present in the West Lewis coastal environment. This area is recognised as a highly sensitive and biologically active marine system; however, the baseline data provided is inadequate. The methodologies used fail to effectively capture the presence, behaviour, and habitat use of various species, which undermines the ability

to evaluate potential impacts accurately.

One notable gap in the assessment is the treatment of otters, which are classified as a European Protected Species. The application does not adequately recognise or assess their utilisation of coastal areas for foraging and movement. The omission of key details regarding their core foraging range and behavioural patterns leaves the potential impacts of construction disturbance, noise, and increased activity unassessed. This lack of thorough evaluation casts doubt on the conclusions reached about the absence of significant effects on otters.

Further weaknesses are evident in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions, which is likely to lead to an underestimation of their presence. This is particularly evident when comparing the results to established land-based observations, which indicate a frequent use of these waters. The failure to incorporate relevant data results in a deficient baseline and diminishes the reliability of the conclusions drawn.

The methodological limitations outlined mean that assertions of negligible or non-significant effects are grounded in assumptions rather than solid evidence. Additionally, the lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, such as seasonal variation and broader ecosystem interactions. This lack of clarity raises questions about the true scale of risk facing marine species and habitats.

From a regulatory viewpoint, the application does not fulfil the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty that arises from these inadequacies prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Therefore, in light of these circumstances, the granting of consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the ornithological impacts related to the proposed development is fundamentally flawed, characterised by significant gaps in evidence and internal inconsistencies that undermine its conclusions. It is crucial to note that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. However, the application fails to provide adequate evidence to demonstrate that these species will not be adversely affected. Additionally, the development is situated within key foraging areas and migratory

pathways, yet there is a lack of robust evaluation regarding the implications of displacement, collision risk, or habitat loss.

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to address the cultural heritage and community identity of the West Lewis coastline, which is a dynamic cultural landscape interwoven with environment, language, tradition, and community. It adopts a narrow perspective, viewing heritage merely as disconnected, unchanging assets rather than recognising their vital ongoing social, cultural, and spiritual roles within the community.

Culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are

not accurately represented in the assessment. These locations are active burial sites and centres of spiritual practice; however, they are wrongly categorised as static features. This mischaracterisation ignores their continued significance, the impact of development on their settings, and leads to an inadequate evaluation of the cultural implications.

Moreover, the assessment neglects intangible aspects of cultural heritage, including the Gaelic language, traditional practices, and the deep-rooted relationship between the community and its coastal environment. These elements are crucial to the area's identity, yet they are entirely omitted from the assessment, which represents a serious oversight. Without these considerations, the true cultural impact of the development remains unexamined.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking community, recognised as Indigenous People, has not been afforded Free, Prior and Informed Consent in this process. The lack of meaningful engagement calls into question the validity of the assessment and disregards essential principles of participation in matters affecting cultural and environmental interests.

Additionally, there is a critical procedural failure due to the absence of a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018. This omission prevents the competent authority from meeting its legal obligation to evaluate the social, cultural, and economic impacts on the island community, thereby hindering a lawful determination.

From a policy standpoint, these deficiencies directly contradict National Planning Framework 4, especially regarding the preservation of historic assets and places. The disregard for both tangible and intangible heritage, along with the failure to recognise living cultural practices, illustrates a significant departure from established policy requirements.

In summary, the inadequate assessment of living heritage, intangible cultural values, community rights, and compliance with statutory obligations leads to a substantial evidential gap. The application does not sufficiently evaluate the cultural impacts of the development, thus failing to provide a clear understanding of its true cultural costs.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The transparency surrounding the social impacts, health, and wellbeing related to this proposal is critically lacking, which significantly undermines the evaluation process. Although the developer has commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This absence of information creates a substantial evidential gap, inhibiting both public understanding and the ability of the competent authority to assess the social risks highlighted by the developer’s own research.

Residents have reported experiencing stress, anxiety, and concern directly associated

with the scale and proximity of the proposed development. These impacts stem from direct engagement and are firmly rooted in evidence, not conjecture. However, without access to the complete assessment, the findings cannot undergo adequate scrutiny, limiting the capacity to evaluate their significance during the decision-making process.

Moreover, the proposal is viewed as a potential threat to community identity and cohesion, with indications of “cultural loss” emerging from the developer’s own findings. These impacts have not been thoroughly incorporated into the main application or afforded appropriate consideration. The failure to disclose the full Social Impact Assessment obscures the true human and social costs of the development.

This lack of transparency also compromises the integrity of the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is essential for developments of this magnitude, particularly when they could affect community character and functioning. The absence of the complete data set results in a failure to provide a thorough evidential basis necessary for weighing the benefits against the harms.

From a policy standpoint, the application falls short in demonstrating adherence to National Planning Framework 4 regarding health and wellbeing. Developments should promote positive health outcomes and mitigate harm, yet existing evidence suggests adverse effects that have not been adequately disclosed. Consequently, it is impossible to show compliance with this policy without the full assessment.

The procedural ramifications are profound. The competent authority is unable to carry out a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a significant omission within the application and a failure to meet the evidential standards mandated by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, along with documented evidence of existing adverse impacts, renders the assessment incomplete and untrustworthy. This inadequacy obstructs a lawful determination and underscores the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual impacts on the seascape, landscape, and environment is significantly inadequate and does not truly reflect the extent of change or the sensitivity of the receiving environment. The West Lewis coastline, characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness, would undergo a fundamental transformation with the introduction of large-scale turbines in close proximity to the shoreline. Such developments would create a continuous industrial presence that would permanently alter the area's character.

Moreover, the application fails to accurately depict the scale of visual change. The turbines, due to their size and proximity, would dominate views from residential areas,

historic sites, and popular coastal locations. This would negatively affect visual amenity and diminish the key qualities of naturalness and remoteness, while the assessment does not effectively communicate the significance of these impacts within a sensitive landscape context.

There are also serious methodological issues regarding the choice and presentation of visual viewpoints. It appears that the selected viewpoints do not fully encompass the most sensitive receptors or the worst-case scenarios, particularly concerning important cultural heritage sites and valued landscapes. This raises the possibility that the assessment has understated the magnitude of visual impact, thus questioning the reliability of its findings.

Furthermore, the assessment does not adequately consider the interconnected relationship between the landscape, seascape, and cultural heritage. Key sites, such as the Calanais Standing Stones and other Scheduled Monuments, form part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment erroneously treats these sites as isolated entities, neglecting their interdependence and leading to an incomplete understanding of the impacts on their cultural significance and setting.

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

From a policy standpoint, the proposal directly contradicts National Planning Framework 4, which aims to protect natural spaces and historic assets. The extent of the proposed changes is incompatible with the need to maintain landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further erodes any assertion of compliance with policy requirements.

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

In summary, the assessment does not accurately reflect the scale of impact, the environment's sensitivity, or the interrelatedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is at odds with the protection of this vital landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks a thorough assessment of construction and pollution risks, leaving it insufficient for determining the likely environmental effects. It involves significant

seabed preparation and installation activities in a high-energy Atlantic setting, yet it does not present comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it suggests that mitigation and contingency measures will be established after consent is granted, obstructing any meaningful evaluation of their potential adequacy or effectiveness.

This uncertainty regarding future measures is particularly troubling, considering the sensitivity of the environment along the West Lewis coastline, which is home to clean coastal waters and vital habitats susceptible to sediment disturbance and pollution. Although the application notes risks such as sediment mobilization and the possibility of chemical or oil spills, it lacks sufficient detail on methods to prevent, control, or monitor these occurrences.

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

The concerns are further exacerbated by the absence of detailed emergency response procedures. By postponing contingency planning until after consent, the application fails to allow for an evaluation of whether adequate safeguards will be in place to address pollution incidents. 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 deferral of essential environmental safeguards contravenes the stipulations of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies are evaluated prior to granting consent, and 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.

In summary, the lack of clearly defined mitigation measures, detailed management plans, and clarity on potential impacts contributes to a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks, reinforcing the notion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

A critical issue arises from the assumption that fishing activity can be displaced without consequence. The application lacks evidence that alternative fishing grounds exist, are accessible, or can support additional pressure. This significant omission risks overfishing in other areas, potentially leading to wider economic consequences for the local fleet. Without a clear, evidence-based assessment, the effects on fisheries and livelihoods cannot be fully understood.

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is insufficient and fails to encompass the full range of impacts from a project that should be considered as a cohesive whole. The offshore turbines and the onshore works are inherently connected, yet their evaluation occurs separately, leading to a disjointed analysis that masks the true extent of environmental and socio-economic consequences.

Onshore components include cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure that traverses sensitive

landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, a crucial carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, obstructing a comprehensive understanding of the project's environmental footprint.

By failing to address the onshore impacts adequately, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project elements are assessed collectively; however, the disjunction between offshore and onshore evaluations leaves the combined repercussions on peatlands, habitats, and local communities inadequately explored.

There are notable risks to sensitive habitats, such as machair systems and peatland environments, which receive policy protection. The application does not sufficiently show that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, resulting in a significant evidential gap concerning biodiversity protection.

Furthermore, the routing of infrastructure through active croft land raises potential conflicts with established land use and legal rights. The application fails to provide evidence that the requisite consents or processes have been initiated, bringing into question the deliverability and legal compliance of the project.

From a policy viewpoint, the lack of a comprehensive assessment of the project as a unified entity, alongside insufficient demonstration of protection for peatlands, habitats, and land use interests, is in direct conflict with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife in the Environmental Impact Assessment is a significant omission that raises serious concerns. The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in defining the environmental quality, cultural identity, and tourism potential of the area. The introduction of permanent red aviation lighting will create a continuous and intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

Furthermore, the proposal fails to evaluate the implications of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This is especially critical as dark skies contribute to the identity of the area and are increasingly important for emerging tourism sectors such as astro-tourism. The absence of this assessment reveals a glaring gap in the overall landscape and

environmental evaluation.

Equally concerning is the lack of consideration for nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial lighting due to phototaxis, which can result in disorientation and a heightened risk of collisions. The proposal does not include any assessment of the lighting's impact or a phototaxis study, leaving unexamined the potential effects of aviation lighting on these species and their mortality rates.

The deficiencies in the ornithological assessment are compounded by the reliance on daytime survey data, which fails to account for nocturnal behaviours and associated risks. Kittiwakes, for example, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been addressed. The lack of site-specific night-time data creates a critical deficiency in understanding the ecological impacts.

Without an assessment of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites would suffer adverse impacts. The evidential standard required to exclude potential adverse effects beyond reasonable scientific doubt is not met, necessitating the application of the precautionary principle and preventing a lawful determination.

Moreover, this omission conflicts with the National Planning Framework 4 regarding the protection of natural places and environmental quality, undermining the overall assessment of landscape and seascape impacts. Night-time character is an integral aspect of the environment that has not been sufficiently addressed.

In summary, the complete absence of any assessment regarding 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 acknowledges that 86% of visitors are attracted by scenery, yet it does not assess how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution of tourism. Tourism is crucial for the Isle of Lewis, relying on the region's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Since 2017, tourism has expanded from £65 million to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy.

The assessment fails to consider how the industrialisation of the seascape and loss of environmental quality could affect Tourism Gross Value Added or the overall economic resilience of the area. Without this analysis, it is impossible to ascertain whether the proposed development would result in a net economic benefit or hinder a vital and growing sector. The omission of a Dark Skies Assessment further exacerbates this

issue, creating a significant gap in understanding the impacts on a recognised segment of the local economy, namely nature-based tourism and astro-tourism.

In an island community with limited economic diversification, the lack of consideration for tourism impacts has broader implications for local employment, 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 viewpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly regarding economic impact and the need to show net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide sufficient evidence for the competent authority to evaluate the economic implications of the proposal.

Overall, the deficiencies in quantifying tourism impacts, analysing the environmental drivers of visitor behaviour, and acknowledging the island's economic dependency create a significant evidential gap. This undermines a thorough assessment of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm epitomises a significant shortfall in meeting the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. It mirrors the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. This latest application, presented under a more robust policy framework, still fails to adequately address concerns regarding biodiversity, peatland protection, landscape integrity, and community wellbeing.

A thorough evidential basis for this application is lacking. There are notable deficiencies in baseline data, the use of an ambiguous design envelope, unspecified mitigation measures, and the failure to address key impact pathways, such as nocturnal wildlife, the full extent of onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects and residual impacts.

Procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment represents a significant omission. These oversights hinder the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, the proposal is at odds with the National Planning Framework 4. It does not adequately demonstrate the safeguarding of biodiversity, natural spaces, and cultural

heritage, nor does it provide assurance that health and wellbeing impacts are acceptable. There is also a lack of evidence supporting a net economic benefit, as tourism impact modelling is absent. The failure to properly assess the cumulative impacts of both offshore and onshore components conceals the potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. The incomplete assessments of marine ecology, seabirds, protected species, and marine mammals contain inconsistencies. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, which engages the precautionary principle and obstructs a lawful conclusion regarding the acceptability of impacts.

Additionally, 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, disruption to cultural and visual relationships, and negative impacts on tourism represent permanent consequences that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively inadequate for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks obstructs a lawful, evidence-based decision. It is imperative that the competent authority refuse consent on these grounds or utilise the appropriate regulatory measures to obtain the necessary information.

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

Additional Comments

I am appalled that you wish to use this area for renewable energy. Install it somewhere that will not have as much impact on the surrounding views & scenery.
I cannot imagine the level of impact this proposal will bring to the marine & bird life, biodiversity etc. The human community will be impacted by installation & infrastructure too, let alone being left to live with any EMF emissions that we discovered with other colonies of wind turbines.
Please, if this renewable energy is so necessary, go & place it in some area where it won't impact the scenery or affect any living form of life.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 3930A904

Member of the public 964

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the applicable marine licensing and Environmental Impact Assessment regimes. The objection arises from a comprehensive review of the Environmental Impact Assessment Report and accompanying documents, revealing significant planning, environmental, cultural, and procedural deficiencies. The project is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. The design, scale, and proximity of the project raise serious concerns about its alignment with statutory requirements, national policies, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. There are notable gaps in critical environmental data, with baseline information being both limited and inconsistent. Several key elements of the proposal are not well-defined. Furthermore, the adoption of a flexible design framework complicates the assessment of potential significant effects, and the reliance on unspecified mitigation measures renders it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence to substantiate them.

There are also evident and substantial conflicts with policy. The proposal does not appear to align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory criteria necessary for consent and hinder the competent authority's capacity to conclude that the development can be accepted under policy considerations.

The unprecedented scale of the proposal in this area, with large turbines being positioned in close proximity to the shoreline, raises significant issues related to landscape capacity, visual impact, and environmental effects. Collectively, the lack of adequate information, reliance on undefined mitigation measures, evidential deficiencies, 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.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks material completeness and does not deliver a transparent or reliable account of the expected environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations of turbines, creates considerable uncertainty. This situation hinders the consistent application of a worst-case scenario analysis. Consequently, the integrity of the assessment is compromised, meaning that the impacts presented may not accurately reflect the development that will ultimately be constructed. This deficiency obstructs both public and competent authority understanding of the true extent of the environmental effects.

Furthermore, the application depends significantly on mitigation measures, monitoring strategies, and management plans that remain undefined. Consent is sought on the premise that environmental harm will be addressed later, which hampers a meaningful evaluation of the effectiveness of these measures and the assessment of residual impacts. Such deferral of crucial information to post-consent stages is procedurally unacceptable and contradicts the fundamental purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies must be clearly established before any determination.

Additional evidential deficiencies are apparent, including incomplete baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. These issues generate uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information obscures a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that is incompatible with statutory requirements.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally inadequate, failing to recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are intrinsically connected. The application adopts a reductive approach, treating heritage as isolated, static assets

rather than acknowledging their ongoing social, cultural, and spiritual function within the community.

A significant deficiency arises from the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment categorises them merely as static features, neglecting their continued use and the impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects and disregards their integral role within community life.

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

Concerns about community rights and engagement further exacerbate the situation. The Gaelic-speaking population has a distinct cultural identity recognised as characteristic of Indigenous Peoples; however, no process of Free, Prior and Informed Consent has been undertaken. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to reflect established principles of participation in decisions affecting cultural and environmental interests.

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development involves the introduction of large-scale turbines in close proximity to the West Lewis coastline. This area is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The presence of these

turbines would create a continuous industrial landscape, fundamentally altering the character of this environment and resulting in a permanent and irreversible transformation.

The assessment provided fails to adequately reflect the magnitude of the visual change that would occur. The scale and proximity of the turbines mean they would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the qualities of naturalness and remoteness. This assessment does not convey the true level of impact, particularly in the context of such a sensitive landscape.

Methodologically, there are concerns regarding how visual viewpoints have been selected and presented. It appears that these viewpoints may not capture the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This oversight introduces the risk of underestimating the magnitude of visual impact, thus calling into question the reliability of the assessment.

Another critical deficiency is the failure to assess the interconnectedness of landscape, seascape, and cultural heritage. Important sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. The assessment considers these sites in isolation, neglecting their interdependence, which results in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these vital relationships, altering how heritage assets are experienced and disrupting their connection to the natural horizon. This issue presents not just a visual impact but also a broader cultural and spatial harm that has not been adequately explored within the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The scale of change associated with the turbines 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 undermines any assertions 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 lessened to an acceptable level through mitigation measures.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry. However, the application does not sufficiently demonstrate that these vital uses and habitats can be safeguarded or maintained without experiencing significant disruption. A primary concern is the assumption that fishing activity can be displaced without adverse effects. The application fails to provide evidence that alternative fishing grounds are available, accessible, or capable of sustaining additional pressure. This omission is critical, as displacement may lead to overfishing in other areas and could have broader economic repercussions for the local fishing fleet. The impacts on fisheries and local livelihoods cannot be adequately assessed without a clear, evidence-based evaluation.

Moreover, the proposal presents substantial risks to marine species, particularly due to underwater noise generated during construction. The anticipated high-energy hammer piling over a prolonged period is likely to disturb marine life over considerable distances, affecting species such as dolphins. The predicted impact on a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application diminishes the importance of these effects without sufficient evidence to support such a claim.

Furthermore, the application acknowledges the necessity of licenses to permit harm to European Protected Species, yet simultaneously describes the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises serious questions regarding compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project's onshore infrastructure is significantly lacking and fails to account for the full range of impacts from what is essentially one integrated project.

The offshore turbines and the onshore works are interconnected, but they are evaluated separately, which results in a disjointed approach that obscures the true extent of environmental and socio-economic consequences.

Among the onshore components are cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure that traverses sensitive landscapes. These activities involve excavation in areas of deep peat, especially in Barvas Moor, which is an important carbon store and ecologically sensitive area. The application does not adequately assess these impacts, hindering a comprehensive understanding of the project's total environmental footprint.

By neglecting or postponing the assessment of onshore impacts, the application undermines the ability to properly evaluate cumulative effects. The Environmental Impact Assessment process necessitates that all project components are considered collectively; however, the division between offshore and onshore elements means the combined effects on peatlands, habitats, and communities remain poorly understood.

Furthermore, there are notable risks to sensitive habitats, such as 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 taken. This results in a significant gap in the evidence related to biodiversity protection.

Concerns regarding carbon balance are also prominent. Disturbing peatland releases stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently tackle this concern or prove that the overall carbon balance remains advantageous.

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

From a policy standpoint, the failure to assess the project comprehensively and to 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.

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and does not meet the requirements of sustainable development as outlined in

statutory duties and national policy. It mirrors the core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Now, under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the proposal still fails to address these concerns adequately.

There are significant gaps in the evidential basis for the proposal. It does not include comprehensive baseline data and continues to utilise an undefined design envelope. Furthermore, it relies on unspecified mitigation measures and omits critical impact pathways, such as those related to nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, limiting the understanding of likely significant effects and residual impacts.

Procedural issues also mar the application. The lack of a compliant Island Communities Impact Assessment violates the Islands (Scotland) Act 2018, while the failure to provide a complete Social Impact Assessment represents a material omission. These shortcomings hinder the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal conflicts with the National Planning Framework 4 as it does not adequately protect biodiversity, natural places, and cultural heritage. It fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, as tourism impact modelling has not been conducted. The assessment of the cumulative impact from both offshore and onshore elements is inadequate, obscuring potential effects on 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 are incomplete and inconsistent in parts. The evidential threshold required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, combined with conflicts with policy and unresolved environmental risks, inhibit a lawful, evidence-based decision. The competent authority should refuse consent for the Spiorad na Mara Offshore Wind Farm application in its entirety.

Additional Comments

Our island and stunning wildlife will be hugely affected by this ghastly project. Nobody wants to have our beautiful views taken away from us.

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: 213D18B7

Member of the public 965

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 in accordance with the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and the associated documentation reveals significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, a near-pristine environment, and a strong cultural identity.

The application lacks an adequate evidential basis for a lawful determination. It is notable that critical environmental data is absent, baseline information is inconsistent and limited, and essential elements of the proposal remain undefined. The application's flexible design framework obstructs a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures means that their efficacy cannot be evaluated. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects not backed by robust evidence.

There are clear and significant conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements designed to protect biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests necessary for consent, ultimately undermining the ability of the competent authority to deem the development acceptable from a policy standpoint.

The scale of the proposed development is unprecedented for this area, with large turbines situated in close proximity to the shoreline, raising considerable concerns about landscape capacity, visual dominance, and environmental impact. When considering the lack of sufficient information, the reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete and incapable of supporting a lawful determination. In light of these issues, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and does not deliver a complete, transparent, or reliable analysis of the potential environmental consequences of the proposal. The introduction of a flexible Project Design Envelope,

lacking a commitment to defined turbine dimensions, layouts, or configurations, creates considerable uncertainty and hinders the application of a worst-case scenario. This deficiency undermines the assessment's integrity, resulting in a situation where the impacts outlined may not represent the actual development built. Consequently, both the public and the competent authority are left unable to grasp the true extent of the environmental effects.

The application leans significantly on mitigation measures, monitoring strategies, and management plans that remain unspecified. Seeking consent under the assumption that environmental harm will be addressed later obstructs a meaningful evaluation of their effectiveness or an assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigations be clearly defined prior to determination.

There are also notable evidential shortcomings, including inadequate baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. Such gaps lead to uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without solid supporting data. The lack of sufficient information obstructs a clear comprehension of cumulative and worst-case impacts, introducing a scientific uncertainty that fails to comply with statutory requirements.

Consequently, the application does not meet the evidential standards established under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, especially in relation to biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been thoroughly assessed or that suitable safeguards are in place.

When considered 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 unreliable and incomplete. These flaws obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority unable to reach a decision based on the information presented.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is inadequate, failing to provide a complete and reliable understanding of ecological receptors in this sensitive marine area. The methodologies employed do not effectively capture crucial aspects such as species presence, behaviour, and habitat use, leading to an incomplete baseline dataset. This deficiency undermines the foundation necessary for evaluating potential impacts.

A notable oversight is the assessment of otters, which are classified as a European

Protected Species. The application neglects to properly acknowledge their active use of coastal regions for foraging and movement. Consequently, the assessment lacks consideration of their core foraging range and behavioural patterns, leaving the potential impacts of construction disturbance, noise, and increased human activity unassessed. This failure to evaluate these factors calls into question any conclusions drawn regarding the absence of significant effects on otters.

The evaluation of basking sharks also presents significant deficiencies, as the reliance on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions. This method likely underestimates the presence of these sharks, especially when compared to established land-based observations that demonstrate their frequent utilisation of these waters. The lack of incorporation of such data contributes to an incomplete baseline, further undermining the reliability of the conclusions presented.

As a result of these methodological shortcomings, the claims of negligible or non-significant effects are based more on assumptions than on solid evidence. Additionally, the insufficiency of baseline data hampers the ability to assess cumulative and indirect impacts effectively, which encompass seasonal variations and broader ecosystem interactions. This situation generates uncertainty about the actual risks posed to marine species and their habitats.

Regulatory compliance issues arise as the application does not satisfy the requirements established by the Environmental Impact Assessment framework and the National Planning Framework 4, since protected species have not been properly identified or assessed. The uncertainty introduced prevents the exclusion of adverse effects beyond a reasonable scientific doubt, activating the precautionary principle. Therefore, consent for the proposed application cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions results in an unreliable assessment. These critical deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, ultimately indicating that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to meet the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. Significant gaps in evidence and internal inconsistencies within the ornithological assessment undermine its conclusions. There is a fundamental contradiction in the application, as the developer asserts no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary where significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that its conclusions are unsupported by the evidence presented.

Furthermore, the assessment does not provide sufficient evidence that seabirds

associated with protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. The importance of these feeding grounds is not fully considered, and the reliance on modelling approaches introduces uncertainty, particularly for species that are already in severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially in instances where baseline data is incomplete and behavioural responses are not entirely understood.

The siting of turbines within a recognised migratory corridor introduces a significant risk by effectively creating a barrier in a primary flight path utilised by species travelling between the United Kingdom and Iceland. The assessment does not adequately evaluate the long-term implications of sustained mortality within this corridor or the potential effects on species with small global populations.

From a regulatory perspective, the presence of contradictory conclusions, data gaps, and limitations in modelling means the standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle and obstructs a lawful conclusion in favour of consent. The deficiencies identified indicate a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application presents an inadequate assessment of fisheries and marine life, failing to provide a reliable evaluation of both ecological and socio-economic impacts. There is a troubling assumption that fishing activities can be displaced without consequences, yet the application does not offer evidence that alternative fishing grounds exist or are accessible to accommodate the additional pressure. This significant omission raises concerns about potential overfishing in other areas and could have broader economic ramifications for the local fishing fleet.

Furthermore, the proposal carries substantial risks to marine species, particularly due to underwater noise from construction activities. The extended use of high-energy hammer piling is anticipated to cause disturbances across large distances, which could adversely affect species such as dolphins. Alarmingly, the predicted disturbance to a notable portion of the local bottlenose dolphin population is downplayed within the application, lacking sufficient supporting evidence to address these serious concerns.

There is also a notable inconsistency in the application regarding the need for licences to permit harm to European Protected Species, as it acknowledges the requirement for such authorisation while simultaneously describing the impacts as negligible. This contradiction undermines the assessment's credibility and raises issues about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal approval.

Moreover, the assessment neglects to consider cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, the overall impact on marine ecosystems and the socio-economic landscape remains uncertain.

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 current marine users or mitigate unacceptable impacts on marine biodiversity, thus hindering the conclusion that this proposal constitutes sustainable development.

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

SUMMARY

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

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

Moreover, there are evident procedural failures. The lack of a compliant Island Communities Impact Assessment violates statutory obligations set out in the Islands (Scotland) Act 2018. Additionally, the failure to disclose a full Social Impact Assessment constitutes a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies render the application unsuitable for determination.

The proposal also contradicts the National Planning Framework 4 by failing to demonstrate adequate protection for biodiversity, natural environments, and cultural heritage. It does not adequately address health and wellbeing impacts or provide evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore elements have not been thoroughly assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

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

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

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

Additional Comments

The likely impact of this project on wildlife in this area is scary.

The UK has few enough areas of unspoilt coastline and the nesting bird populations around this area are important for the maintenance of global populations. It is important that everything is done to preserve these species for future generations and this project is obviously a large threat that has not been properly assessed for its impact on nesting and migratory birds.

Sea otters and dolphins too have diminishing habitats and anything that will impact on these, like this project, must be properly assessed for the damage it will cause to these valuable species.

Mankind cannot simply trample roughshod over the needs of other species that share this world with us, and I think this project could be doing that because of poor and biased assessment of its impact

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: 1B5125E7

Member of the public 966

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.

FISHERIES AND MARINE LIFE

The application for development lacks a thorough assessment of its effects on fisheries and marine ecosystems, which presents significant risks to both ecological and socio-economic aspects. The waters off the West Lewis coast are home to a diverse marine life and an established fishing industry. However, the proposal does not convincingly demonstrate that these important resources can be safeguarded from substantial disruption.

A notable concern is the presumption that fishing activities can be easily relocated without negative repercussions. There is no evidence presented that alternative fishing grounds exist or that they are accessible for use, which could support additional pressure on those areas. This gap is critical, as the potential for overfishing in alternative locations poses wider economic risks to the local fishing fleet. The absence of a clear, evidence-backed assessment means that the consequences for fisheries and the livelihoods dependent on them remain unclear.

Moreover, the proposal carries significant risks for marine species, especially due to the underwater noise produced during construction. The anticipated extended hammer piling is expected to cause disturbances over large areas, impacting species such as dolphins. The projected disturbance of a large segment of the local bottlenose dolphin population is alarming; however, the application minimizes these effects without adequate supporting evidence.

Inconsistencies are also evident within the application itself. While it acknowledges the requirement for licenses to permit harm to European Protected Species, it simultaneously describes these impacts as negligible. This contradiction seriously undermines the credibility of the assessment and raises questions about adherence to the Habitats Regulations, especially when harm is expected to a degree necessitating legal authorisation.

Additionally, the assessment neglects to account for cumulative impacts resulting from various pressures like habitat disruption, noise, and the displacement of fishing activities. Without a thorough examination of these combined factors, it is impossible to assess the overall impact on marine ecosystems and socio-economic conditions accurately.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It does not indicate that the development can coexist with existing marine users or avoid unacceptable consequences for marine biodiversity, which hinders any conclusion regarding the sustainability of the proposal.

In summary, the lack of supporting evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies all contribute to an incomplete and unreliable assessment. These shortcomings obstruct a comprehensive evaluation of the potential impacts on marine life and fisheries.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal represents a significant failure to meet the standards of sustainable development as required by statutory duties, national policy, and evidential benchmarks. The concerns raised echo those from the 2008 refusal of the Lewis Wind Power proposal, which was deemed unacceptable due to the scale of industrialisation. Now, this application arrives under a more stringent policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps in baseline data undermine the application's evidential reliability. The use of an undefined design envelope and unspecified mitigation measures, alongside omissions regarding nocturnal wildlife impacts, the full scope of onshore infrastructure, and tourism effects, render the Environmental Impact Assessment incomplete. As a result, it fails to provide a comprehensive understanding of likely significant effects or any residual impacts.

Procedural failures further weaken the proposal. The lack of a compliant Island Communities Impact Assessment breaches statutory requirements under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment is a material omission that obstructs the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal directly contradicts National Planning Framework 4, as it does not effectively demonstrate protection of biodiversity, natural places, and cultural heritage. It falls short in showing 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 impacts from both offshore and onshore components have not been adequately assessed, thereby obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are not only incomplete but, in some instances, internally inconsistent. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

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

Considering these factors, the application is both procedurally and substantively unfit for determination. The scale of information deficiencies, coupled with conflicts in policy and unresolved environmental risks, hampers the ability to make a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuse consent on these grounds or activate relevant regulatory provisions to mandate

the submission of the missing information.

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

Additional Comments

Once again they are extending more into the sea ,the northern grounds of wick are next, before long me or my children will have no where to fish.

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: 4F6BEA45

Member of the public 967

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

Dear Sir/Madam

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application presents significant deficiencies in its assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured, reasoned comparison of feasible alternatives based on their environmental impacts, the submission provides a narrative detailing project evolution. This approach does not sufficiently demonstrate that less harmful options have been thoroughly identified, assessed, and chosen over more damaging solutions.

There is a notable lack of a transparent, evidence-based comparison concerning alternative offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has adequately considered the placement of turbines further offshore, which could potentially lessen visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impact make this oversight particularly concerning. Consequently, without such analysis, it is impossible to conclude that the proposed siting is the least damaging option.

These shortcomings also extend to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been thoroughly examined to minimise impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear avoidance strategy and absence of comparative analysis suggest that mitigation by design has not been adequately considered, leading to an over-reliance on post-design mitigation measures.

Due to these issues, 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 prevents the competent authority from discerning whether more suitable, less harmful alternatives are available. The absence of a comprehensive alternatives assessment raises doubts about whether the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy jeopardises compliance with National Planning Framework 4, especially regarding the protection of natural spaces, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission that leads to the conclusion that the application has not been sufficiently evaluated and cannot lawfully support a determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

One crucial shortcoming involves otters, classified as a European Protected Species. The application neglects to appropriately recognise and evaluate their active use of coastal regions for foraging and movement. The failure to consider their core foraging ranges and behavioural patterns results in an inadequate assessment of potential impacts from construction disturbances, noise, and increased activity. This gap undermines any assertions regarding the absence of significant effects on otters.

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

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

From a regulatory standpoint, the application fails to comply with the Environmental Impact Assessment requirements and National Planning Framework 4, as it does not correctly identify or assess protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Under these conditions, granting consent is not legally permissible.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment concerning the ornithological implications of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that compromise its conclusions. Located within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which supports internationally significant seabird populations, the application fails to adequately demonstrate that these species will not face adverse effects. Despite acknowledging that seabird populations are already in decline, the assessment does not robustly evaluate critical factors such as displacement, collision risk, or habitat loss.

Moreover, a serious contradiction arises within the application. While the developer asserts that there will be no significant adverse effects, they simultaneously propose a

Habitats Regulations derogation case, which is necessitated 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 evidence presented.

The evidence regarding seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, is insufficient to assure that these species will remain unaffected. The significance of these crucial feeding grounds is not adequately considered, and the reliance on modelling techniques introduces uncertainty, particularly for vulnerable species such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate potential mortality, particularly when baseline data is lacking and behavioural responses are not fully comprehended.

Additionally, the placement of turbines within a recognised migratory corridor introduces a considerable risk, effectively obstructing a primary flight path utilized by species migrating between the United Kingdom and Iceland. The application does not thoroughly assess the long-term repercussions of sustained mortality within this corridor or the potential impact on species with small global populations.

From a regulatory standpoint, the application fails to meet the evidential threshold necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This scenario invokes the precautionary principle, thereby obstructing a lawful conclusion in support of the proposed consent.

The identified deficiencies also represent a failure to adhere to the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not experience adverse effects places the proposal in direct opposition to national policy.

In conclusion, the assessment is rendered unreliable due to its internal inconsistencies, methodological deficiencies, and lack of sufficient evidence. These weaknesses hinder a thorough evaluation of impacts and contribute to the overall determination that the application does not fulfil the statutory requirements essential for its approval.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The introduction of large-scale turbines in close proximity to the shoreline would result in a continuous and dominant industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient, failing to adequately reflect the scale of change or the sensitivity of the receiving environment.

The proposal does not accurately represent the magnitude of visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. The assessment inadequately conveys the significance of these impacts within such a sensitive landscape.

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

A critical deficiency exists in the failure to consider the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting interlinked by visual and spatial relationships with the Atlantic horizon. The assessment treats these heritage assets as isolated entities rather than recognising their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies in the assessment of construction and pollution risks, which is inadequate for evaluating the probable environmental impacts. Critical environmental management frameworks, specifically Construction Environmental Management Plans and Pollution Prevention Plans, are either poorly

developed or absent, particularly given the extensive seabed preparation and installation activities proposed within the high-energy environment of the Atlantic. The reliance on unspecified mitigation and contingency measures, which are to be formulated after consent, hampers any meaningful assessment of their potential effectiveness or sufficiency.

Particularly alarming is the sensitivity of the receiving environment, notably the West Lewis coastline, which is home to clean coastal waters and vital habitats susceptible to disturbances from sediment and contaminants. Although the application acknowledges the risks related to sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to offer adequate information on the strategies for preventing, managing, or monitoring these risks.

Furthermore, there exists a degree of uncertainty concerning the magnitude and dynamics of sediment plumes that may arise from seabed disruption and cable installation. The absence of comprehensive modelling and clearly articulated management strategies renders it impossible to ascertain the potential extent, duration, or ecological implications of such impacts. This uncertainty also encompasses effects on marine species and habitats, which are already recognised as sensitive within the broader assessment framework.

The lack of specific emergency response protocols exacerbates these issues. By postponing contingency planning until after consent is granted, the application undermines the ability to verify whether sufficient safeguards are in place to manage pollution events. This introduces procedural risks and hampers the competent authority's capacity to evaluate environmental protection measures prior to the determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contravenes the obligations set forth by the Environmental Impact Assessment regime. The assessment of likely significant effects and necessary mitigation measures must occur prior to granting consent; the absence of such information precludes a lawful determination. Additionally, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of clearly defined mitigation strategies, insufficient management plans, and uncertainties surrounding potential impacts culminate in a materially deficient assessment. These significant shortcomings impede a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and support a thriving fishing industry. However, the application does not adequately demonstrate how these essential uses and habitats can be preserved or sustained without causing significant disruption. There is a troubling presumption that fishing

activities can simply be relocated without repercussions. The absence of evidence regarding the availability and accessibility of alternative fishing grounds raises concerns, as such displacement could lead to overfishing in other areas, adversely affecting the local fishing fleet and its livelihoods.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The prolonged use of high-energy hammer piling is expected to create disturbances over extensive distances, which may negatively impact local wildlife, including dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population is alarming, yet the application appears to minimise the significance of these potential effects without adequate supporting evidence.

There is a notable inconsistency within the application that acknowledges the necessity of licences for any harm to European Protected Species while simultaneously claiming such impacts are negligible. This contradiction calls into question the credibility of the assessment and raises serious concerns regarding adherence to the Habitats Regulations, especially when harm is expected to occur at a level that necessitates legal authorisation.

Additionally, the assessment neglects to address cumulative impacts resulting from various pressures, such as habitat disruption, noise, and the displacement of fishing activities. Without a thorough evaluation of these interconnected effects, it remains impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate compliance with both National Planning Framework 4 and the National Marine Plan. It does not show that the development can coexist with current marine users or avoid unacceptable effects on marine biodiversity, thereby hindering any conclusion that the proposal embodies sustainable development.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism value. The proposed development would introduce permanent red aviation lighting that is visible over long distances, resulting in a continuous and intrusive “wall of light” effect across the western horizon. This change would fundamentally alter the night-time environment.

The Environmental Impact Assessment fails to evaluate how this lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. The

significance of dark skies to the region's identity and to emerging tourism sectors, such as astro-tourism, makes this omission particularly troubling. The gap in the overall assessment of the landscape and environment is clear.

Moreover, there is no analysis of how the lighting will affect nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application does not provide a lighting impact assessment or a phototaxis study, meaning it neglects to consider how aviation lighting could impact these species or lead to higher mortality rates.

The assessment further relies on daytime survey data, which fails to capture nocturnal activity or associated risks. Kittiwakes, which might forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. Without site-specific night-time data, there is a critical lack of understanding regarding ecological impacts.

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

From a policy standpoint, this omission conflicts with National Planning Framework 4 concerning the protection of natural places and environmental quality. It also detracts from the overall evaluation of landscape and seascape impacts, as night-time character is an essential aspect of the environment.

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

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.

Additional Comments

The industrialisation of some of the rare environments of Scotland must stop. The idea of saving nature by destroying it is absurd. These machines will dominate everything on this, one of the few wild places left.

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: 710B1519

Member of the public 968

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not offer a transparent or reliable account of the potential environmental effects of the proposal. The implementation of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This uncertainty hampers the ability to consistently apply a worst-case scenario, compromising the integrity of the assessment. As a result, the impacts described may not accurately represent the actual development, which hinders both public understanding and the competent authority's evaluation of the true environmental effects.

The application heavily depends on mitigation measures, monitoring strategies, and management plans that are not yet clearly defined. Seeking consent on the premise that environmental harm will be mitigated later prevents a thorough evaluation of effectiveness and residual impacts. Deferring essential information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which requires likely significant effects and mitigation to be established before determination.

There are also substantial evidential gaps, including missing baseline data, limitations in methodology, and reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially where negligible or non-significant effects are asserted without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot meet statutory requirements.

Consequently, the application does not satisfy the evidential standards set 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 compliance with National Planning Framework 4, which includes requirements for biodiversity protection and environmental integrity, as it fails to show that impacts have been fully assessed or that proper safeguards are established.

In summary, the combination of an undefined design envelope, unspecified mitigation measures, and gaps in baseline data results in an unreliable and incomplete Environmental Impact Assessment Report. These issues impede a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a decision based on the provided information.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives is severely lacking and does not fulfil the statutory requirements of the Environmental Impact Assessment regime. The application presents a narrative account of project evolution instead of a structured, reasoned comparison of realistic alternatives based on environmental effects. This failure to properly identify, assess, and select less harmful options in favour of more damaging

solutions is concerning.

There is a significant lack of transparent and evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Notably, the developer has not demonstrated that they have seriously considered the option of placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be reduced. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in assessing impact, the lack of such an analysis prevents any determination that the proposed siting is the least damaging option.

The inadequacies extend to cable routing and landfall assessment. There is insufficient evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The absence of a clear avoidance strategy and the lack of comparative analysis suggest that mitigation by design has not been employed, with undue reliance on post-design mitigation measures instead.

Consequently, the application fails to show that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This represents a clear failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to assess 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 deficiency undermines compliance with National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a material omission, contributing to the overall conclusion that the application has not been adequately evaluated and is unable to support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species lacks completeness and does not offer a reliable understanding of the ecological receptors in the West Lewis coastal environment. This area is a biologically active marine system that is highly sensitive; however, the baseline data provided is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment fails to establish a sound evidential basis for evaluating potential impacts.

Significant gaps exist in the consideration of otters, a species protected under European law, as the application does not adequately recognise or assess their use of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns leads to an inadequate evaluation of the potential impacts from construction disturbance, noise, and increased activity. This oversight undermines any

conclusions suggesting the absence of significant effects on this species.

Deficiencies also emerge in the assessment of basking sharks, as the dependence on aerial surveys introduces considerable detection bias, particularly in the prevailing Atlantic conditions. This reliance is likely to underestimate their presence compared to established land-based observations that indicate frequent use of these waters. The failure to integrate or appropriately consider this data results in an incomplete baseline, which further undermines the reliability of the conclusions drawn.

These methodological shortcomings indicate that the conclusions of negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of adequate baseline data hampers any meaningful assessment of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This scenario creates uncertainty about the real 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 level of uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These issues prevent a robust evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application is built on an insufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposal involves the development of turbines within a designated migratory corridor on the Isle of Lewis, an area that supports internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with this application is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. The assessment does not adequately demonstrate, to the required evidential standard, that these species will not be adversely affected. It fails to robustly evaluate critical factors such as displacement, collision risk, or habitat loss associated with the proposed development, particularly given its location within key foraging areas and migratory pathways.

A fundamental contradiction is evident in the application. While the developer claims there will be no significant adverse effects, it simultaneously puts forth a Habitats Regulations derogation case, which is necessitated only in scenarios where significant harm is anticipated. This inconsistency raises serious questions about the reliability of the assessment and suggests that its conclusions lack proper support from the underlying evidence. The assessment inadequately addresses the potential effects on

seabirds linked to protected sites such as the Lewis Peatlands and St Kilda, failing to fully account for the significance of these feeding grounds. The reliance on modelling approaches introduces a layer of uncertainty, particularly for species that are already experiencing severe declines, like Kittiwakes and Fulmars. Consequently, the methodologies used may underestimate mortality rates, especially in light of incomplete baseline data and a lack of understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor introduces significant risks, effectively obstructing a primary flight path that species utilise when travelling between the United Kingdom and Iceland. The assessment does not sufficiently analyse the long-term implications of sustained mortality within this corridor or the potential effects on species with relatively small global populations. Regulatory concerns arise from the application's failure to meet the evidential threshold necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the assessment has not satisfied the standard of beyond reasonable scientific doubt. This scenario invokes the precautionary principle, which hampers the ability to reach a lawful conclusion in favour of granting consent.

The identified deficiencies also suggest a failure to comply with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected places the proposal in direct conflict with national policy. Collectively, these shortcomings render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. Such flaws hinder a thorough evaluation of impacts and contribute to the conclusion that the application does not meet the statutory requirements necessary for a positive determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are active burial and spiritual places. Yet, these are mischaracterised as static features in the assessment, which fails to acknowledge their continued use, meaning, and the potential impact of development on their setting. This oversight leads to an incomplete evaluation of cultural effects and neglects their significance in community life.

The assessment also overlooks intangible cultural heritage, such as the Gaelic language and traditions, along with the deep connection between the community and the coastal environment. These aspects are vital to the identity of the area and their absence signifies a significant omission. Without addressing these factors, the cultural

impact of the development cannot be accurately assessed.

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

A critical procedural failure is the lack of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority cannot fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

These deficiencies conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage and to recognise living cultural practices is a clear deviation from policy requirements.

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not provide a sufficient basis for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full report of the Social Impact Assessment commissioned by the developer has not been published, creating a significant evidential gap. This lack of transparency denies both the public and the competent authority the ability to fully comprehend the social risks identified through the developer's own research. Available summaries highlight that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are therefore not speculative, yet the failure to disclose the complete assessment hinders proper scrutiny and limits understanding of their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal is seen as a direct threat to community identity and cohesion. The developer's findings identify "cultural loss," but these impacts have not been adequately integrated into the main application or given appropriate consideration. This withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

The implications of this lack of transparency extend to the Environmental Impact Assessment process itself. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this scale, particularly when

community character and functioning are at stake. The application does not provide the complete dataset necessary for a thorough assessment of the balance between benefits and harm.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development projects must promote positive health outcomes and avoid harm, yet the evidence available points to existing adverse effects that have not been fully revealed. Without the complete assessment, there is no way to confirm compliance with this policy.

The procedural ramifications are considerable, as the competent authority cannot perform a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This omission represents a material failure within the application and does not satisfy the evidential requirements set out by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual 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 West Lewis coastline is home to clean coastal waters and vital habitats that are sensitive to sediment disturbance and contamination. However, the proposal fails to adequately address construction and pollution risks associated with substantial seabed preparation and installation works within a high-energy Atlantic environment. There are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on future mitigation and contingency measures that will only be developed post-consent, which prevents any meaningful assessment of their adequacy or effectiveness.

This lack of defined future measures is alarming, especially given the known risks such as sediment mobilisation and potential chemical or oil spills acknowledged in the application. Nonetheless, it provides insufficient detail on the strategies for preventing, controlling, or monitoring these risks. Furthermore, there is significant uncertainty regarding the scale and behaviour of sediment plumes that may arise from seabed disturbances and cable installation. Without robust modelling and well-defined management strategies, it is impossible to gauge the extent, duration, or ecological consequences of these impacts, which could adversely affect already sensitive marine

species and habitats.

The absence of thorough emergency response procedures adds another layer of concern. By postponing contingency planning until after consent is granted, the application precludes the evaluation of whether adequate safeguards are in place for addressing potential pollution incidents. This approach introduces procedural risks and weakens the ability of the competent authority to assess environmental protection measures effectively at the point of determination.

From a regulatory standpoint, deferring critical environmental safeguards conflicts with the Environmental Impact Assessment regime's requirements. Significant effects and necessary mitigation measures must be evaluated prior to consent, and the lack of such information renders a lawful determination unachievable. Additionally, the application does not demonstrate compliance with the essential policy requirements concerning environmental protection and water quality.

Overall, the combination of undefined mitigation measures, inadequate management plans, and uncertainty about potential impacts leads to a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding marine species and habitats along the West Lewis coast, a region that not only boasts a diverse marine ecosystem but also supports an active fishing industry. The assessment provided is inadequate, lacking a robust evaluation of both ecological and socio-economic impacts. It neglects to demonstrate how these vital uses and habitats can be protected without substantial disruption.

A critical flaw in the application is the assumption that fishing activities can be displaced without repercussions. There is no evidence presented to suggest that alternative fishing grounds are available or can sustain the additional pressure resulting from this displacement. This oversight is particularly alarming, as it risks leading to overfishing in different areas and could have broader economic repercussions for the local fishing fleet. Without a solid, evidence-based assessment, the potential impacts on fisheries and the livelihoods dependent on them remain obscured.

In addition, the proposal introduces considerable risks to marine life, notably through the underwater noise generated during construction activities. The use of high-energy hammer piling over an extended duration is expected to disturb marine species across considerable distances, including the local bottlenose dolphin population. The anticipated disturbance to a significant portion of these dolphins raises profound concerns, yet the application appears to minimise the severity of these effects, lacking adequate supporting evidence.

Furthermore, there is an evident inconsistency in the application. While it

acknowledges the necessity for licenses to permit harm to European Protected Species, it simultaneously characterises these impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious questions about its compliance with the Habitats Regulations, particularly where anticipated harm requires legal authorisation.

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

From a policy standpoint, the application fails to demonstrate adherence to the 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 adverse effects on marine biodiversity. This lack of clarity prevents the determination of whether the proposal represents sustainable development.

Overall, the deficiencies in evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment incomplete and unreliable. These shortcomings ultimately hinder a comprehensive evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and does not adequately consider the impacts associated with what constitutes a single integrated project. The offshore turbines and the onshore works are inherently connected, yet they are assessed in isolation. This fragmented approach obscures the true extent of environmental and socio-economic effects.

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

Exclusion or deferment of onshore impact assessments prevents a thorough evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered collectively; however, the segmentation of offshore and onshore elements leads to an incomplete understanding of the combined effects on peatlands, habitats, and local communities.

Moreover, there are substantial risks to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application fails to

demonstrate that the impacts on these habitats have been fully evaluated or that appropriate avoidance measures have been implemented. This creates a significant evidential gap concerning biodiversity protection.

Concerns regarding carbon balance also arise from the proposal. The disturbance of peatland results in the release of stored carbon, potentially creating a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this issue nor does it show that the overall carbon balance remains beneficial.

Additionally, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application does not provide evidence that the requisite consents or processes have been initiated, which raises questions about the deliverability and lawful execution of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism value. However, the Environmental Impact Assessment omits any evaluation of dark skies and nocturnal wildlife, representing a significant oversight. The proposal includes permanent red aviation lighting that would be visible over long distances, creating a continuous “wall of light” across the western horizon and fundamentally altering the night-time environment.

The absence of an impact assessment for this lighting on visual amenity, landscape character, and the experiences of residents and visitors is particularly concerning, given the critical role dark skies play in the area's identity and the burgeoning sector of astro-tourism. This oversight results in a noticeable gap in the overall landscape and environmental evaluation.

Furthermore, the application does not consider the effects of the proposed lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly susceptible to artificial lighting due to their phototaxis behaviour, which can lead to disorientation and increased risks of collision. The lack of any lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species and the risk of increased mortality are not

addressed.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity and associated risks. For instance, Kittiwakes may forage or migrate at night and are vulnerable to disorientation from artificial lighting, yet this risk has not been examined. The absence of site-specific night-time data leaves a critical void in understanding the ecological impacts.

Without an assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would be adversely impacted. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt is not met, which invokes the precautionary principle and hinders lawful determination of the application.

From a policy standpoint, this omission contradicts National Planning Framework 4 regarding the protection of natural places and environmental quality. It also weakens the comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is a vital aspect of the overall ecosystem.

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 makes the application incomplete and unable to support a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails fundamentally to meet the criteria for sustainable development as required by statutory obligations, national policies, and evidential standards. This application reiterates the principal concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, specifically regarding the unacceptable level of industrialisation. It is presented under a more robust policy framework that emphasises the importance of biodiversity, peatland conservation, landscape integrity, and the wellbeing of the community.

A reliable and comprehensive evidential basis for the determination is not provided within the application. Significant deficiencies exist in baseline data, including the continued use of an unspecified design envelope and an overreliance on unspecified mitigation measures. Furthermore, crucial impact pathways are omitted, such as those concerning nocturnal wildlife, comprehensive onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment is inadequate, failing to allow for a complete understanding of likely significant effects or residual impacts.

There are also significant procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of the complete Social Impact Assessment represents a substantial omission. These issues inhibit the competent

authority from evaluating effects on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal is inconsistent with National Planning Framework 4. It does not demonstrate the protection of biodiversity, natural environments, and cultural heritage. Furthermore, it fails to provide evidence that health and wellbeing impacts are acceptable and lacks modelling of tourism impacts, which undermines claims of a net economic benefit. The cumulative effects of both offshore and onshore components have not been adequately assessed, thereby obscuring 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 not only incomplete but also internally inconsistent in certain aspects. The evidential requirement to dismiss adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and obstructing any lawful conclusion regarding the acceptability of impacts.

The proposal is set to induce substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, along with impacts on tourism, signify permanent consequences that cannot be mitigated to an acceptable degree.

Overall, the application is both procedurally and substantively unfit for determination. The extensive information gaps, alongside policy conflicts and unresolved environmental risks, hinder a lawful and evidence-based decision. The competent authority is obliged either to refuse consent on these bases or to invoke appropriate regulatory measures to require the submission of the missing information.

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

Additional Comments

I have spent months on the west coast of Lewis over my lifetime and this special area has contributed much to my family. The wind farm threatens local ecosystems, community and the precious indigenous way of life that still exists here.
Benefits will not trickle down to the local communities who live here, this is a corporate land grab which will devastate this beautiful and spiritual place which has long been a place of sanctuary for both the local people, visitors and animals who spend time here.
The consultation has failed to take into account local interests and alienated the people it will affect most.
I will be personally devastated that this beautiful place which has long supported myself and my family in times of need is being spoiled if this project goes ahead

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: 9E8EC6C0

Member of the public 969

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. The objection is based on a review of the Environmental Impact Assessment Report and supporting documentation. It identifies deficiencies related to planning, environmental concerns, cultural factors, and procedural issues. 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 introduce significant concerns about its compliance with statutory requirements, national policy, and sustainable development principles. The application lacks a sufficient evidential basis for a lawful determination. There is critical missing environmental data, and the baseline information provided is limited and inconsistent. Key aspects of the proposal remain undefined. The use of a flexible design framework hampers a clear understanding of likely significant effects, while the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation fails to provide a full understanding of the environmental, cultural, or community impacts, and claims of negligible effects lack robust evidence.

Additionally, there are substantial policy conflicts. 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 does not demonstrate that it can meet national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts are critical to the statutory tests for consent and undermine the competent authority's ability to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal, with large turbines positioned close to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. Taken together, the insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete. As a result, it is incapable of supporting a lawful determination, and the precautionary principle should apply in this situation.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents several significant deficiencies that undermine its reliability and transparency regarding the proposal's environmental effects. Notably, the application’s use of a flexible Project Design Envelope lacks

commitment to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty, thereby inhibiting a consistent application of a worst-case scenario. Such an approach compromises the integrity of the assessment and obscures the true extent of environmental impacts from both the public and the competent authority.

Furthermore, the application depends heavily on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under the premise that environmental harm will be addressed in the future obstructs any substantive evaluation of effectiveness or the assessment of residual impacts. The deferral of critical information to post-consent stages is procedurally unacceptable, as it contradicts the fundamental objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures are clearly established prior to determination.

Additionally, the assessment suffers from substantial evidential deficiencies, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. This results in uncertainties surrounding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are presented without adequate supporting data. The lack of sufficient information leads to an inability to fully understand cumulative and worst-case impacts and introduces scientific uncertainties that do not align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, it fails to demonstrate compliance with National Planning Framework 4, which includes requirements for biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been comprehensively assessed or that appropriate safeguards are implemented.

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

ASSESSMENT OF ALTERNATIVES

The evaluation of alternatives within the application is significantly lacking and fails to comply with the statutory obligations of the Environmental Impact Assessment regime. Instead of offering a thorough and structured comparison of viable alternatives based on their environmental effects, the application merely recounts the project's development history. This narrative does not adequately illustrate that less harmful options have been appropriately identified, evaluated, and favoured over more

detrimental choices.

There is a notable absence of a transparent, evidence-based comparison of various offshore sites, development scales, or design configurations. Specifically, the developer has not convincingly explored the possibility of situating turbines further offshore, which would likely mitigate visual, ecological, and coastal impacts. The West Lewis coastline's sensitivity and the crucial role of proximity to the shore in assessing impact render this omission particularly significant. Consequently, it is impossible to assert that the proposed location is indeed the least harmful option.

This lack of thorough assessment also extends to cable routing and landfall considerations, where there is insufficient evidence to suggest that alternative routes have been adequately investigated to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The failure to present a clear avoidance strategy and the absence of comparative analysis indicate that the approach taken lacks mitigation by design, relying instead on post-design measures.

Therefore, the application does not sufficiently show that environmental harm has been minimised through careful site selection, layout decisions, and infrastructure routing. This failure to adhere to the established mitigation hierarchy hampers the competent authority's ability to ascertain whether more appropriate and less harmful alternatives are available. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal aligns with sustainable practices or meets policy requirements.

From a policy standpoint, this inadequacy raises concerns about compliance with National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment represents a significant gap that contributes to the overall conclusion that the application has not undergone sufficient scrutiny 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. This area is known for its biological activity, yet the baseline data presented is incomplete, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of marine species. Consequently, the evaluation lacks a reliable evidential basis for assessing potential impacts.

A significant concern lies with the assessment of otters, which are classified as a European Protected Species. The application does not adequately acknowledge their active use of the coastal areas for foraging and movement. There is a notable failure to consider their core foraging range and behavioural patterns. As a result, the potential impacts of construction disturbance, noise, and increased activity on otters have not

been sufficiently evaluated, undermining conclusions about the absence of significant effects on this species.

Moreover, the assessment of basking sharks is similarly deficient. The reliance on aerial surveys introduces 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 show frequent use of these waters. The neglect of such critical data further weakens the completeness of the baseline and affects the reliability of the conclusions drawn.

These methodological shortcomings lead to conclusions of negligible or non-significant effects being based on mere assumptions rather than solid evidence. The lack of adequate baseline data also hampers the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual risks to marine species and habitats.

From a regulatory standpoint, the application fails to comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it does not properly identify or 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 conclusion, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These significant deficiencies inhibit a thorough evaluation of impacts on marine ecology and protected species, ultimately indicating that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development fails to meet necessary evidential standards, particularly regarding its impact on seabird populations along the west coast of the Isle of Lewis, which are internationally significant and experiencing declines. It is situated within critical foraging areas and migratory pathways, yet the evaluation does not adequately address the risks of displacement, collision, or habitat loss for these species.

A notable inconsistency arises within the application itself; the developer claims there will be no significant adverse effects, while also pursuing a Habitats Regulations derogation, which is typically necessitated only when significant harm is anticipated. This contradiction raises serious concerns about the assessment's reliability and suggests that the conclusions drawn are not substantiated by the evidence presented.

The assessment lacks sufficient evidence regarding the potential impact on seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda. The critical nature of these feeding areas is underappreciated, and the dependence on modelling techniques introduces considerable uncertainty, particularly for species like Kittiwakes

and Fulmars that are already in sharp decline. Furthermore, the methodologies utilised are likely to underestimate mortality rates due to incomplete baseline data and an inadequate understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor represents an additional risk by effectively creating a barrier in a primary flight path used by birds migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term consequences of sustained mortality within this corridor or the potential impact on species that have relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to ascertain no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, data deficiencies, and limitations in modelling means the required standard of beyond reasonable scientific doubt has not been attained. This invokes the precautionary principle, thereby obstructing a lawful conclusion that would support consent.

These identified deficiencies indicate a failure to comply with the National Planning Framework 4 in terms of safeguarding biodiversity and 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.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline embodies a rich cultural landscape where the environment, language, tradition, and community are deeply intertwined. The assessment of cultural heritage and community identity is fundamentally inadequate, as it treats heritage merely as a collection of isolated and static assets, rather than recognising their ongoing social, cultural, and spiritual significance within the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are particularly overlooked. These sites serve as active places of burial and spiritual practice, yet they have been mischaracterised as static features in the assessment. This failure to acknowledge their continued use and the implications of development on their setting results in an incomplete evaluation of cultural effects, neglecting their vital role in community life.

Moreover, intangible cultural heritage, including the Gaelic language and traditions, as well as the long-standing relationship between the community and the coastal environment, is not assessed. These elements are essential to the area's identity and their absence represents a significant omission. Without this consideration, it becomes

impossible to properly understand the cultural impact of the proposed development.

Concerns extend to community rights and engagement, particularly given that the Gaelic-speaking population holds a distinct cultural identity recognised as characteristic of an Indigenous People. The lack of a Free, Prior and Informed Consent process undermines the assessment's legitimacy, failing to uphold established principles of participation in decisions that affect cultural and environmental interests.

Compounding these issues is the critical procedural failure regarding the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

From a policy standpoint, these deficiencies put 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, as well as to acknowledge living cultural practices, marks a clear deviation from policy requirements.

Overall, the failure to properly assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application without a solid basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

Preliminary summaries indicate that local residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These reported impacts stem from direct engagement and are factual, not speculative. However, the lack of disclosure regarding the full assessment limits scrutiny of these findings and obstructs a thorough evaluation of their significance in the decision-making process.

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

the true human and social costs of the development.

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

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

The procedural ramifications are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a crucial omission within the application and a failure to satisfy the evidential requirements set forth by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the proposed development's impacts on seascape, landscape, and visual quality is significantly lacking and fails to adequately account for both the scale of change and the sensitivity of the surrounding environment. The West Lewis coastline, characterised by its open Atlantic horizon, undeveloped nature, and pronounced sense of remoteness, is at risk of being fundamentally altered by the introduction of large-scale turbines positioned near the shore. This would result in a persistent industrial presence that would irrevocably transform the landscape.

Moreover, the application does not sufficiently convey the extent of the visual change anticipated. Given their scale and proximity, the turbines would dominate the views from residential areas, historic sites, and popular coastal locations, thereby directly impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment's failure to accurately represent this level of impact and its significance within such a sensitive landscape is a critical oversight.

Methodological issues also arise concerning the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, especially concerning significant cultural heritage sites and areas of high landscape value. This introduces a risk of

underestimating the magnitude of visual impact, thereby compromising the reliability of the assessment.

Additionally, the assessment does not consider the interconnected relationship between landscape, seascape, and cultural heritage adequately. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape setting linked visually and spatially to the Atlantic horizon. By treating these sites as isolated entities, the assessment overlooks their interdependence, leading to an incomplete understanding of how impacts on their setting and cultural significance arise.

The industrialisation of the seascape would sever these vital connections, altering the context in which heritage assets are perceived and disrupting their relationship with the natural horizon. This situation represents not only a visual impact but also a wider cultural and spatial detriment that has not been properly assessed in the application.

From a policy standpoint, the proposal directly contradicts the National Planning Framework 4 regarding the safeguarding of natural spaces and historic assets. The anticipated scale of change is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the absence of a comprehensive worst-case assessment further undermines claims of compliance with policy requirements.

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

In summary, the assessment falls short in accurately depicting the extent of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies preclude a reliable evaluation and affirm the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is notably deficient, lacking the necessary detail to adequately evaluate the likely environmental impacts. The proposed development entails extensive seabed preparation and installation activities within a high-energy Atlantic environment. However, the application fails to present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that are to be formulated after consent, which inhibits a meaningful evaluation of their sufficiency or effectiveness.

This reliance on undefined measures is particularly alarming considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters

and significant habitats that are susceptible to sediment disruption and pollution. While the application acknowledges the risks associated with sediment mobilisation and potential chemical or oil spills, it lacks sufficient detail regarding the prevention, control, or monitoring of these risks.

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

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent has been granted, the application obstructs the evaluation of whether adequate safeguards are established to address pollution incidents. This creates procedural risks and diminishes the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contravenes the stipulations of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to consent, and in the absence of such information, a lawful determination cannot occur. Additionally, the application does not demonstrate adherence to policy requirements regarding environmental protection and water quality.

In conclusion, the combination of undefined mitigation measures, the absence of comprehensive management plans, and the uncertainty surrounding potential impacts culminate in a materially deficient assessment. These inadequacies hinder a robust evaluation of construction and pollution risks and reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of fisheries and marine life as presented in the application is inadequate and lacks a thorough examination of ecological and socio-economic implications. The West Lewis coastal waters are home to a rich marine ecosystem and support a vibrant fishing industry. However, the application fails to prove that these vital uses and habitats can be preserved or maintained without causing significant disruption.

A major concern is the premise that fishing activities can be relocated without repercussions. The application lacks evidence to demonstrate that alternative fishing grounds are available, accessible, or capable of accommodating the additional pressures that may arise. This gap is critical, as such displacement could lead to overfishing in other areas and may adversely affect the local fishing fleet's economic stability. Without a robust, evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

The proposal also poses considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The extended use of high-energy hammer piling is likely to disturb marine life over considerable distances, impacting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is troubling; nevertheless, the application diminishes the importance of these potential effects without adequate supporting evidence.

Moreover, there exists a notable contradiction within the application, where the necessity for licenses to permit harm to European Protected Species is recognised, yet the impacts are simultaneously categorised as negligible. This inconsistency undermines the credibility of the assessment and raises doubts regarding compliance with the Habitats Regulations, especially where harm is expected to an extent that requires legal approval.

Additionally, the assessment does not adequately address cumulative impacts stemming from various pressures such as habitat disturbance, noise, and the displacement of fishing activities. Without a detailed evaluation of these collective effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the combination of insufficient evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies results in an assessment that is incomplete and unreliable. These shortcomings hinder a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

footprint.

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value. However, the Environmental Impact Assessment fails to consider dark skies and nocturnal wildlife, representing a serious oversight. The proposed development would introduce permanent red aviation lighting that would be visible over long distances. This would create an intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

There is no assessment of the impact this lighting would have on visual amenity,

landscape character, or the experiences of residents and visitors. Given the significance of dark skies to the local identity and to emerging tourism sectors like astro-tourism, this omission is particularly concerning. The application also neglects to evaluate the effects on nocturnal wildlife, including sensitive species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are at risk of disorientation and increased collision due to artificial lighting. The lack of any lighting impact assessment or phototaxis study means the potential effects on these species and their mortality risk remain unexamined.

This gap is made worse by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and associated risks. Kittiwakes, known to 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 void in understanding ecological impacts.

Without evaluating these nocturnal impacts, it is impossible to determine if protected species or designated sites would face adverse effects. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt is not met, triggering 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 undermines the comprehensive assessment of landscape and seascape impacts, as the night-time character is an essential component of the environment.

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

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

Having lived in Lewis for 18 years I am strongly concerned with the impact of this massive wind farm on the islands and its people . There are so many reasons environmental being the biggest and its impact on marine life and islle of Lewis land and people the fact that there is already too much wind power on the grid also what happens to the wind farm as it degrades after only
35 yrs of life

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: EBE06046

Member of the public 970

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. It is founded on a thorough review of the Environmental Impact Assessment Report and accompanying documentation, highlighting substantial deficiencies in planning, environmental considerations, cultural aspects, and procedural integrity. The project is situated off the west coast of the Isle of Lewis, an area known for its Atlantic-facing coastline, relatively untouched environment, and rich cultural heritage. Concerns regarding the scale, proximity, and design of the proposal raise serious questions about its alignment with statutory obligations, national policies, and the core principles of sustainable development.

The application lacks a solid evidential foundation for a lawful decision. There are significant gaps in critical environmental data, with baseline information being limited and inconsistent, leaving many key components of the proposal inadequately defined. The proposed flexible design framework obscures a clear assessment of potentially significant effects, and the anticipated mitigation measures, which remain unspecified, render it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust supporting evidence.

Policy conflicts are evident and considerable. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment requirements, or National Planning Framework 4, especially concerning biodiversity, natural areas, cultural heritage, and health and wellbeing. It does not adequately show that the national obligations to preserve biodiversity, safeguard climate interests, and maintain environmental integrity can be fulfilled. These discrepancies directly relate to the statutory tests necessary for consent and hinder the competent authority's ability to determine the development's acceptability from a policy standpoint.

The unprecedented scale of this proposal, with large turbines positioned very close to the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental repercussions. The combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. In light of these issues, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks crucial details and does not adequately outline the potential environmental effects of the proposal. The use of a flexible Project Design Envelope, which does not commit to specific turbine dimensions or configurations, creates considerable uncertainty. This uncertainty undermines the assessment's integrity, making it impossible to apply a worst-case scenario consistently. Consequently, the impacts described may not accurately represent the final development, leaving both the public and the competent authority unaware of the actual environmental effects.

Moreover, the application places significant reliance on unformed mitigation measures, monitoring strategies, and management plans. Seeking consent based on promises of addressing environmental harm at a later stage hinders any meaningful evaluation of effectiveness or residual impacts. This postponement of critical information until after consent is granted contradicts the fundamental principles of the Environmental Impact Assessment regime, which requires that significant effects and mitigation are clearly defined before any determination.

There are also major gaps in evidence, such as insufficient baseline data, methodological limitations, and reliance on assumptions instead of site-specific facts. These issues lead to uncertainty about the impact scale and significance, particularly where claims of negligible or non-significant effects lack strong supporting data. The insufficient information restricts a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainties that do not align with statutory requirements.

As a result, the application does not meet the evidential standards established 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 demonstrate adherence to National Planning Framework 4, including biodiversity protection and environmental integrity, as it fails to show that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

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

The assessment notably overlooks otters, classified as a European Protected Species. The application does not adequately recognise or evaluate their active use of coastal areas for foraging and movement, failing to consider their core foraging range and behavioural patterns. This gap in understanding means that the potential effects of construction disturbance, noise, and increased activity on otters have not been properly assessed, undermining any conclusions regarding the absence of significant effects on this species.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity along the West Lewis coastline, which is a living cultural landscape where environment, language, tradition, and community are deeply interconnected. The application adopts a reductive perspective, treating heritage merely as isolated, static assets, rather than acknowledging their ongoing social, cultural, and spiritual significance within the community.

Notably, the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas is a key deficiency. These sites serve as active places of burial and spiritual practice; however, they are classified as static features in the assessment.

This oversight neglects their continued use and the implications of development on their surroundings. As a result, the evaluation of cultural effects is incomplete, dismissing their vital role in community life.

Additionally, the assessment disregards intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These elements are fundamental to the area's identity, yet they are entirely overlooked, creating a significant gap in understanding the true cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population holds a unique cultural identity with characteristics recognized for Indigenous Peoples, 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 honour established principles of participation in matters affecting cultural and environmental interests.

A further critical procedural failure is the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission is enough to render the determination unlawful.

From a policy standpoint, the inadequacies in the application place it in direct conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to account for both tangible and intangible heritage, and the neglect of living cultural practices, signifies a clear violation of policy requirements.

Ultimately, the collective failure to evaluate living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development remain improperly assessed, and the application lacks a sufficient foundation for understanding the true cultural cost of 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 evaluation of visual impacts and the seascape and landscape effects of the proposed development is fundamentally flawed and does not adequately account for the extent of change or the vulnerability of the environment it will affect. The coastline of West Lewis is characterised by an unspoilt Atlantic horizon, a natural setting, and a pronounced sense of seclusion. The introduction of large turbines in close proximity to the coast would create a persistent and overwhelming industrial presence, which would fundamentally change this character and lead to a permanent and irreversible alteration of the landscape.

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

Methodological issues arise concerning the choice and depiction of visual viewpoints.

Evidence indicates that the selected viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, especially regarding significant cultural heritage sites and valuable landscapes. This oversight risks underestimating the visual impacts, compromising the assessment's reliability.

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

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are experienced and severing their ties to the natural horizon. This situation represents not just a visual issue but a broader cultural and spatial detriment that has not been adequately examined in the application.

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The application proposes substantial seabed preparation and installation works in a high-energy Atlantic environment; however, the assessment of construction and pollution risks is incomplete. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans, which results in reliance on mitigation and contingency measures that are to be prepared after consent. This approach prevents any meaningful evaluation of their adequacy or effectiveness.

The lack of defined future measures is especially concerning given the sensitivity of the receiving environment along the West Lewis coastline, which supports clean coastal waters and habitats that are vulnerable to sediment disturbance and contamination.

Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide sufficient detail on prevention, control, or monitoring of these risks.

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

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning until after consent, the application fails to allow for an evaluation of whether suitable safeguards are in place to address pollution events. 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, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to consent, and a lawful determination cannot be made in the absence of such information. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the shortcomings arising from the absence of defined mitigation measures, lack of detailed management plans, and the uncertainty regarding potential impacts render the assessment materially deficient. These issues hinder a robust evaluation of construction and pollution risks and further substantiate the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents serious deficiencies in its assessment of fisheries and marine life, failing to deliver a comprehensive 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. However, the application does not demonstrate the ability to protect or maintain these habitats and uses without causing significant disruption.

A notable flaw in the application is the assumption that fishing activity can be relocated without adverse effects. There is no evidence provided to confirm that alternative fishing grounds exist, are accessible, or can bear the additional fishing pressures. This significant omission could lead to overfishing in alternative areas and could have broader economic repercussions for the local fishing fleet. An absence of a clear, evidence-based assessment hampers the understanding of potential impacts on fisheries and local livelihoods.

Additionally, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The anticipated high-energy hammer piling over a prolonged period is expected to cause disturbances over large distances, impacting species such as dolphins. The predicted disturbance to a considerable portion of the local bottlenose dolphin population is alarming; yet the application downplays these effects without adequate supporting evidence.

There is an evident contradiction within the application, which acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously asserting that impacts are negligible. This inconsistency undermines the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially in areas where anticipated harm necessitates legal authorisation.

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

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

In conclusion, the lack of 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 potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is fundamentally lacking, failing to encompass the comprehensive impacts associated with this singular integrated project. The offshore turbines and the onshore works are closely interconnected, yet they are evaluated in isolation, leading to a disjointed approach that obscures the magnitude of the environmental and socio-economic consequences.

Key onshore elements involve cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure across delicate landscapes. These activities entail excavation in areas of deep peat, particularly within Barvas Moor, which is vital as a significant carbon store and an ecologically sensitive habitat. The proposal does not provide an exhaustive assessment of these impacts, obstructing a complete understanding of the project's environmental footprint.

By neglecting to assess the onshore impacts or postponing their evaluation, the application obstructs an accurate analysis of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered in unison; however, the fragmentation of offshore and onshore elements results in a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

Significant risks are posed to sensitive habitats, such as machair systems and peatland environments, which benefit from policy protection. The application fails to illustrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance strategies have been implemented, leading to a substantial evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. The disturbance of peatland has the potential to release stored carbon, thus creating a carbon debt that undermines the goals of renewable energy development. The application does not sufficiently address this matter or demonstrate that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is a lack of evidence that the requisite consents or procedures have been commenced, which brings the deliverability and lawful execution of the project into question.

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

In summary, the separation of project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts render this aspect of the application incomplete and 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 region's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that would be visible across long distances, resulting in a continuous and intrusive effect on the western horizon, fundamentally altering the night-time environment.

The Environmental Impact Assessment fails to evaluate the consequences of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly significant due to the importance of dark skies to the area's identity and the growing tourism sector, including astro-tourism. The lack of consideration for these impacts creates a clear deficiency in the overall landscape

and environmental assessment.

Moreover, there is no analysis of the effects of artificial lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to such lighting, which can lead to disorientation and an increased risk of collision. The application does not include any impact assessment regarding this lighting or a phototaxis study, thus failing to evaluate the potential effects on these species or the risk of increased mortality.

Additionally, the reliance on daytime survey data in the ornithological assessment fails to capture the nocturnal activities or associated risks. Species like Kittiwakes, which might forage or migrate during the night, are also vulnerable to disorientation from artificial lighting, yet this risk has not been evaluated. The absence of specific night-time data creates a critical gap in understanding the ecological impacts.

Without an assessment of nocturnal effects, it remains uncertain whether protected species or designated sites would face adverse impacts. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt is not achieved, which engages the precautionary principle and obstructs lawful determination.

From a policy standpoint, this omission contravenes the National Planning Framework 4 regarding the protection of natural environments and the maintenance of environmental quality. Furthermore, it undermines the wider evaluation of landscape and seascape impacts, as the character of night-time settings is a fundamental component of the environment.

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

TOURISM

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

Tourism has experienced significant growth, escalating from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the assessment neglects to model the potential impacts of industrialising the seascape and the resulting loss of environmental quality on Tourism Gross Value Added and the wider economic resilience. Without this analysis, it remains unclear if the proposed development would provide a net economic benefit or

detract from a sector that is already established and flourishing.

Additionally, the application does not adequately consider the role of environmental quality in supporting tourism, particularly the significance of unspoiled landscapes and dark skies for visitor experiences. This is especially important for emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a substantial gap in understanding the potential impacts on a recognised and expanding sector of the local economy.

In an island community that has limited economic diversification, the inadequate assessment of tourism impacts has broader implications for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities, as required under the Islands (Scotland) Act 2018, have not been evaluated.

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

In summary, the deficiencies in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and considering the island's economic dependency result in a significant evidential gap. This gap hinders a thorough evaluation of the economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The 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

N4 conflicts with the Development Plan and NPF4
- N4 harms protected seabirds
- N4 harms vulnerable and protected marine life
- N4 harms humans living in close proximity
- N4 conflicts with the landscape and character of the West Side of Lewis
- N4 harms visual amenity by introducing an industrial scale that clashes with the horizon
- N4 conflicts with and threatens tourism
- N4 harms dark skies
- N4 conflicts with transport capacity
- N4 harms heritage and other historic sites
- N4 causes cumulative harm that is long-term and difficult to reverse

- N4 conflicts with biodiversity policy
- N4 threatens community identity, tradition, and the distinct character of the West Side

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: 145059FF

Member of the public 971

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the applicable marine licensing and Environmental Impact Assessment frameworks. The objection arises from an examination of the Environmental Impact Assessment Report and its associated documents, revealing significant deficiencies related to planning, environmental impact, cultural considerations, and procedural aspects. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural heritage. Concerns have been raised regarding the proposal's compatibility with statutory requirements, national policies, and the principles of sustainable development due to its scale, proximity, and design.

A crucial issue is the inadequate evidential basis provided for a lawful assessment of the application. There are notable gaps in critical environmental data, while baseline information is both limited and inconsistent. Furthermore, important elements of the proposal remain undefined. The application employs a flexible design framework that hinders a clear comprehension of the potential significant effects, and it relies on unspecified mitigation measures, which precludes an evaluation of their effectiveness. Consequently, the documentation does not furnish a full or informed understanding of the impacts on environmental, cultural, or community aspects, and assertions of negligible or non-significant effects lack robust evidence.

Moreover, the application presents clear and significant conflicts with established policy. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. The proposal does not sufficiently demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to determine whether the development is acceptable in policy terms.

The unprecedented scale of the proposal in this region, with large turbines positioned near the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and incapable of sustaining a lawful determination. Under these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary detail to adequately account for the potential environmental effects of the proposal. A flexible Project Design Envelope is used, which does not specify turbine dimensions, layouts, or configurations. This creates uncertainty and makes it difficult to apply a worst-case scenario consistently. As a result, the assessment may not accurately reflect the impacts of the final development, leaving both the public and the competent authority unaware of the true environmental consequences.

The application places significant reliance on mitigation measures, monitoring strategies, and management plans that have yet to be defined. This means that consent is being sought under the assumption that environmental harm will be addressed after approval, hindering any meaningful evaluation of these measures or the assessment of residual impacts. Such a deferral of important information to post-consent stages is not acceptable and contradicts the purpose of the Environmental Impact Assessment regime, which requires the establishment of likely significant effects and mitigation before a decision is made.

There are also notable evidential shortcomings, including missing baseline data, methodological limitations, and the use of assumptions instead of site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially where negligible or non-significant conclusions are drawn without adequate supporting data. The lack of sufficient information obscures the understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not fulfil the evidential threshold needed under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This raises concerns related to the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal also fails to meet the standards set by National Planning Framework 4, especially those related to biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been thoroughly assessed or that proper safeguards are in place.

In summary, the combination of an undefined design envelope, lack of specific mitigation, and gaps in baseline data leads to an unreliable and incomplete Environmental Impact Assessment Report. These issues hinder a lawful and thorough assessment of environmental effects, meaning the competent authority cannot make an informed decision based on the provided information.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species in the application is fundamentally flawed and does not offer a comprehensive understanding of the ecological receptors present in the West Lewis coastal environment. This area is known for its biological activity and sensitivity, yet the baseline data provided is inadequate.

The methodologies employed fail to effectively capture important information about species presence, behaviour, and habitat use, leading to an unreliable evidential foundation for assessing potential impacts.

There is a significant oversight concerning otters, a European Protected Species. The application does not adequately recognise their usage of coastal areas for foraging and movement. Without proper consideration of their core foraging range and behaviours, the assessment does not thoroughly evaluate the potential impacts of construction disturbance, noise, and increased activity. This gap undermines any conclusions drawn regarding the absence of significant effects on this species.

The assessment also falls short in evaluating basking sharks, primarily due to the reliance on aerial surveys, which carry a significant detection bias, particularly in Atlantic conditions. This method is likely to underestimate their presence when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate relevant data weakens the reliability of the conclusions reached and contributes to an incomplete baseline.

These methodological weaknesses mean that any conclusions drawn about negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of sufficient baseline data hinders the assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. Consequently, there is uncertainty regarding the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed the protected species. The uncertainty present precludes the ability to discount adverse effects beyond reasonable scientific doubt, which necessitates invoking the precautionary principle. Given these conditions, consent cannot be legally granted.

In summary, the assessment's reliance on incomplete baseline data, flawed methodologies, and unsupported conclusions renders it unreliable. These shortcomings inhibit a thorough evaluation of the impacts on marine ecology and protected species and indicate that the application is lacking a sound evidential basis.

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 inadequacy of the assessment concerning cultural heritage and community identity is evident, particularly as it overlooks the West Lewis coastline's status as a living cultural landscape. This area, where environment, language, tradition, and community are deeply intertwined, is treated reductively in the application, which views heritage merely as a collection of isolated, static assets. This perspective fails to recognise the ongoing social, cultural, and spiritual significance these elements hold within the community.

A notable shortcoming is evident in the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practice, yet the assessment categorises them as static features without acknowledging their continued use or the implications of development on their surroundings. Such mischaracterisation leads to an inadequate evaluation of cultural effects and neglects their importance in community life.

Moreover, the application does not address intangible cultural heritage elements, including the Gaelic language and traditions, nor the enduring relationship between the community and the coastal environment. These aspects are integral to the area's identity but are entirely overlooked in the assessment, indicating a considerable omission. Without considering these vital factors, the true cultural impact of the development remains obscured.

Concerns also arise regarding community rights and engagement, particularly for the Gaelic-speaking population, which has a distinct cultural identity recognised as characteristic of an Indigenous People. The lack of a process for Free, Prior and Informed Consent is particularly troubling, as it undermines the legitimacy of the assessment and fails to adhere to established principles of participation in decisions that affect cultural and environmental interests.

Additionally, a significant procedural failure is the absence of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. This omission prevents the competent authority from fulfilling its legal obligation to assess the social, cultural, and economic impacts on the island community, which alone undermines the lawfulness of the determination.

From a policy standpoint, the deficiencies identified place the proposal in direct conflict with the National Planning Framework 4, especially regarding the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, is a clear deviation from established policy requirements.

In conclusion, the combined failure to assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application lacks a sound basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of health, wellbeing, and social impacts related to the proposal is significantly lacking, with transparency essential for a lawful evaluation being absent. Although the developer commissioned a Social Impact Assessment that included focus groups involving local residents, the full report remains unpublished. This creates a critical evidential gap, limiting both public understanding and the competent authority's capacity to grasp the full extent of social risks identified by the developer's own

research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts stem from direct engagement and are therefore grounded in reality, not speculation. However, the failure to disclose the complete assessment restricts adequate scrutiny of these findings, thereby hampering the ability to assess their significance during the decision-making process.

Moreover, there is indication that the proposal threatens community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, such impacts have not been properly integrated into the main application or afforded the necessary importance. The withholding of the entire Social Impact Assessment obscures the genuine human and social costs of the development.

This lack of transparency adversely affects the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly where community character and functioning are at stake. By not providing the complete dataset, the application fails to establish a full evidential basis for weighing the balance of benefits against harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. It is imperative that developments promote positive health outcomes and avert harm. Nonetheless, the evidence available points to existing adverse effects that remain inadequately disclosed. Without the full assessment, it is impossible to confirm adherence to this policy.

The procedural implications of this situation are profound. The competent authority is unable to perform a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a critical omission within the application and a failure to meet the evidential standards set by the Environmental Impact Assessment framework.

In conclusion, the failure to disclose the complete Social Impact Assessment, coupled with evidence of existing negative impacts, renders the evaluation incomplete and unreliable. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient 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 application lacks the necessary detail to properly assess construction and pollution risks, rendering the environmental evaluation fundamentally inadequate. It involves extensive seabed preparation and installation within a challenging Atlantic environment, yet fails to present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on unspecified future mitigation and contingency measures, which hinders any meaningful assessment of their effectiveness or sufficiency.

This dependence on vague future strategies is particularly alarming given the sensitivity of the West Lewis coastline, which is home to clean coastal waters and significant habitats susceptible to sediment disruption and contamination. Although the application recognises risks such as sediment mobilisation and accidental chemical or oil spills, it does not adequately detail how these will be prevented, monitored, or controlled.

There is significant uncertainty concerning the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to potential effects on already identified sensitive marine species and habitats.

Moreover, the lack of thorough emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application precludes evaluation of whether suitable safeguards are in place for responding to pollution incidents. This introduces procedural risk and diminishes the ability of the competent authority to assess environmental protection measures adequately at the determination stage.

From a regulatory standpoint, the postponement of essential environmental safeguards is at odds with the Environmental Impact Assessment requirements. The assessment of likely significant effects and mitigation should occur prior to granting consent; without this critical information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate 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 regarding potential impacts collectively render the assessment materially deficient. These flaws hinder a comprehensive evaluation of construction and pollution risks, further reinforcing the position that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of fisheries and marine life associated with the proposal is inadequate, lacking a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate

that these vital uses and habitats can be preserved or maintained without significant disruption.

One critical flaw lies in the assumption that fishing activity can be displaced without repercussions. The application offers no evidence that alternative fishing grounds are available, accessible, or capable of managing the additional pressure. This lack of information is crucial, as such displacement poses risks of overfishing in other areas, potentially leading to broader economic implications for the local fishing fleet. Without a clear and substantiated assessment, the ramifications for fisheries and local livelihoods remain poorly understood.

Moreover, the proposal raises significant risks for marine species, primarily due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is expected to disturb marine life across considerable distances, impacting species including dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application downplays these effects without adequate supporting evidence.

There is a troubling inconsistency within the application, where the necessity for licences to permit harm to European Protected Species is acknowledged, yet the impacts are simultaneously described as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, particularly when harm is expected to occur to a degree that necessitates legal authorisation.

The assessment also neglects to address cumulative impacts resulting from various pressures such as habitat disturbance, noise, and the displacement of fishing activity. Absent 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 adherence to 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, thus precluding any assertion that the proposal constitutes sustainable development.

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions within the assessment render it incomplete and unreliable. These shortcomings 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, leaving a significant evidential gap regarding the project's overall environmental footprint. This project encompasses both offshore turbines and onshore works, which are intrinsically linked but have been assessed separately. Such a fragmented

approach obscures the true scale of the environmental and socio-economic effects, particularly concerning the impacts on sensitive habitats and communities.

Key onshore elements include the cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure, all of which traverse sensitive landscapes. Excavation across deep peat areas, especially within Barvas Moor—an ecologically significant habitat and vital carbon store—has not been adequately evaluated. The lack of a full assessment prevents a proper understanding of cumulative effects and undermines the Environmental Impact Assessment process, which mandates that all components of a project be considered together.

The proposal raises critical concerns about carbon balance. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. Furthermore, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights, as the application does not provide evidence of necessary consents or processes, thereby calling into question the deliverability of the project.

In terms of policy compliance, the failure to assess the project as a cohesive whole and to ensure the protection of peatlands, habitats, and land use interests conflicts with established frameworks such as the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts on sensitive habitats have been fully assessed, or that adequate avoidance measures are in place, diminishes the reliability of the application. Ultimately, the separation of project components, alongside the absence of a thorough assessment, renders this part of the application incomplete and unfit for lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal presents a significant evidential gap due to the absence of assessments concerning dark skies and nocturnal wildlife, which are crucial components of the Environmental Impact Assessment. The exceptionally dark skies of the West Lewis coastline contribute to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, visible over long distances, is set to create a continuous and intrusive "wall of light" effect across the western horizon. This alteration of the night-time environment raises concerns regarding visual amenity, landscape character, and the experiences of residents and visitors.

Furthermore, there is a critical lack of evaluation regarding the impacts of this lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can lead to disorientation and increased risks of collision. The application notably lacks a lighting impact assessment or a phototaxis study, failing to address how the proposed aviation lighting may impact these vulnerable species or potentially raise mortality rates.

The shortcomings are exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not adequately capture nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate during the night, are similarly at risk of disorientation due to artificial lighting; however, this risk remains unassessed. The lack of site-specific night-time data creates an essential gap in understanding the ecological impacts of the proposal.

As a result, it is impossible to ascertain whether protected species or designated sites would be adversely affected without a thorough assessment of nocturnal impacts. The application fails to meet the required evidential standard to exclude adverse effects beyond reasonable scientific doubt, engaging the precautionary principle and preventing a lawful determination.

In terms of policy, the omission contradicts the National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, it undermines the broader assessment of landscape and seascape impacts, as the character of the night environment is an integral aspect of the overall ecological setting.

In summary, the absence of any assessment focused on dark skies and nocturnal wildlife reveals significant flaws in the application. The lack of baseline data, impact modelling, and species-specific analysis renders it incomplete, thus incapable of supporting a lawful determination.

TOURISM

The economic contribution of tourism on the Isle of Lewis is substantial, having increased from £65 million in 2017 to over £81.5 million. This growth supports more than 1,000 jobs and accounts for as much as 16% of the island's economy. However, the planning application fails to adequately assess the tourism impacts, neglecting to evaluate how large-scale offshore infrastructure could affect visitor numbers, behaviour, and the overall economic contribution of this vital sector. The application acknowledges that 86% of visitors are attracted by the area's scenery, yet lacks a quantified analysis of how industrialising the seascape and diminishing environmental quality might influence tourism's Gross Value Added or the resilience of the local economy.

Moreover, the assessment overlooks the critical role environmental quality plays in supporting tourism, particularly the importance of unspoiled landscapes and dark skies to enhancing visitor experiences. This is especially pertinent given the emergence of markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, creating a significant gap in understanding the impacts on this recognised and expanding segment of the local economy.

For an island community that experiences limited economic diversification, the failure to assess tourism impacts holds broader implications for local employment, businesses, and community sustainability. The absence of a compliant Island

Communities Impact Assessment indicates that these economic vulnerabilities have not been examined as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4 regarding economic impact and the obligation to show net benefit. It conflicts with strategic objectives that designate tourism as a priority growth sector, lacking the necessary evidence for the competent authority to evaluate the economic consequences of the proposed development.

In summary, the deficiencies in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and considering the island's economic dependency create a substantial evidential gap. This inadequacy hinders a thorough evaluation of the economic effects and ultimately leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm does not meet the requirements for sustainable development. It fails to satisfy statutory duties, national policy, and evidential standards. This application presents the same core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Now, despite being presented under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

The application lacks a complete and reliable evidential basis for determination. There are significant gaps in the baseline data, an undefined design envelope, unspecified mitigation measures, and missing key impact pathways, including effects on nocturnal wildlife, full onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete, preventing a clear understanding of likely significant effects or residual impacts.

Procedural failures are evident as well. The absence of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the full Social Impact Assessment is a material omission. These shortcomings hinder the competent authority from properly assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

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

There are uncertainties regarding environmental risks that could be significant.

Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and prevents a lawful conclusion that impacts are acceptable.

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, the disruption of cultural and visual relationships, and the impacts on tourism are permanent effects that cannot be adequately mitigated.

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

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

Additional Comments

This is a totally unnecessary development with financial gains only for the shareholders of these companies.
However the impact on the communities (the people who live there) of Lewis and for tourism is beyond measure!! Tourism and fishing are the main incomes for the people.....who would want to visit the island and see these monstosities?? The beautiful precious landscape will be devastated for ever!!
Marine and bird life will be forever impacted.
This catastrophic proposal must be stopped immediately!
If these companies want the financial gains they must build these monster turbines in their own countries.
This is not about stopping the need for green energy this is about stopping the environmental destruction of our precious land. y

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: 7EAA875B

Member of the public 972

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 is currently under marine licensing and Environmental Impact Assessment regimes. The objection is grounded in a review of the Environmental Impact Assessment Report and associated documents, highlighting deficiencies in planning, environmental aspects, cultural considerations, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area with a coastline facing the Atlantic, known for its near-pristine environment and strong cultural heritage.

Concerns arise due to the unprecedented scale of the proposal, which features large turbines placed close to the shoreline. This positioning raises significant issues related to landscape capacity, visual impact, and overall environmental effects. The application lacks a solid evidential foundation for lawful determination, missing critical environmental data, while baseline information is often inconsistent or insufficient. Many key aspects of the proposal remain unclear, and the flexible design framework obstructs a comprehensive understanding of potential significant effects. Furthermore, the proposal relies on unspecified mitigation measures, rendering it impossible to assess their effectiveness. As a result, the available documentation does not provide a thorough understanding of the environmental, cultural, or community impacts. Claims of negligible or non-significant effects lack strong evidential support.

Substantive policy conflicts exist, with the proposal appearing at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. These conflicts particularly relate to biodiversity, natural habitats, cultural heritage, and health and wellbeing. The application fails to 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 for consent and hinder the competent authority's ability to deem the development acceptable within policy frameworks.

The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear non-compliance with policy indicates that the application is incomplete. Given these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that undermine its reliability and transparency regarding the environmental impacts of the proposal. A notable issue is the reliance on a flexible Project Design Envelope, which

lacks definitive turbine dimensions, layouts, or configurations. This absence creates uncertainty and hinders the effective application of worst-case scenario assessments. Consequently, the presented impacts may not accurately reflect the final construction, making it difficult for both the public and the competent authority to grasp the full extent of the potential environmental effects.

Additionally, the application is contingent upon mitigation measures, management plans, and monitoring strategies that are currently undefined. Seeking consent with the expectation that these environmental harms will be addressed at a later stage undermines the possibility of a meaningful evaluation of their effectiveness or the assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's purpose, which mandates that likely significant effects and mitigation measures be clearly established before determination.

There are also profound evidential shortcomings within the assessment, including gaps in baseline data and limitations in methodology, as well as a reliance on assumptions rather than concrete, site-specific evidence. This leads to uncertainty concerning the magnitude and significance of impacts, particularly where conclusions of negligible or non-significant effects lack robust supporting data. The inadequacy of information prevents a clear understanding of cumulative and worst-case impacts and introduces a degree of scientific uncertainty that does not align with statutory requirements.

Moreover, these factors mean the application does not satisfy the evidential threshold established under the Habitats Regulations, which demands the exclusion of adverse effects beyond reasonable scientific doubt. The precautionary principle is thus engaged, especially in relation to protected species and sensitive habitats. The proposal also fails to demonstrate adherence to National Planning Framework 4, including stipulations regarding biodiversity protection and environmental integrity, as it is impossible to verify that impacts have been comprehensively assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, lack of specified mitigation strategies, and significant gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and thorough evaluation of environmental effects, meaning the competent authority lacks sufficient information to make an informed determination regarding the application.

ASSESSMENT OF ALTERNATIVES

The proposal under consideration presents significant shortcomings in the assessment of alternatives, failing to satisfy the statutory obligations of the Environmental Impact Assessment regime. Instead of offering a systematic and reasoned evaluation of realistic alternatives based on their environmental effects, the application merely recounts the project’s evolution. This narrative fails to substantiate that less harmful options have been thoroughly identified, evaluated, and chosen over more damaging

alternatives.

There is a conspicuous lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not illustrate that the developer has genuinely contemplated positioning the turbines further offshore, an action that could potentially mitigate visual, ecological, and coastal impacts. The West Lewis coastline is sensitive, and the critical significance of proximity to the shore in assessing impact underscores the necessity of such analysis. Without it, it is impossible to assert that the proposed siting is the least damaging option available.

Moreover, this inadequacy extends to the routing of cables and the assessment of landfall, where there is insufficient evidence to demonstrate that alternative routes have been adequately investigated to avoid or minimise harm to sensitive receptors, including culturally and spiritually significant locations like Barvas Cemetery. The absence of a clear avoidance strategy alongside a lack of comparative analysis suggests that the principle of mitigation by design has not been appropriately applied, leading to a reliance on post-design mitigation measures instead.

Consequently, the application does not convincingly establish 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, hindering the competent authority's ability to determine whether less harmful and more suitable alternatives exist. In the absence of a thorough assessment of alternatives, it cannot be affirmed that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, these deficiencies seriously undermine adherence to National Planning Framework 4, particularly concerning the safeguarding of natural environments, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission that leads to the conclusion that the application has not been sufficiently assessed and cannot be lawfully approved.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas, raises serious concerns. These locations are active burial sites and hold spiritual significance, yet they have been categorised as static features in the assessment. This approach neglects their ongoing use and meaning within the community and fails to address how the proposed development will impact their setting. Such mischaracterisation leads to an incomplete understanding of the cultural effects and dismisses their integral role in community life.

Moreover, the assessment disregards intangible aspects of cultural heritage, such as the Gaelic language and local traditions, along with the longstanding relationship between the community and the coastal environment. These elements are vital to the area's identity, yet they are completely omitted from the evaluation. Ignoring these

factors means that the cultural impact of the development cannot be accurately comprehended.

Community rights and engagement also remain inadequately addressed. The Gaelic-speaking population, which possesses characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and fails to reflect established principles for participation in decisions that affect cultural and environmental interests.

A critical procedural failure is evident in the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfill its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders the determination unlawful.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly regarding the protection of historic assets and places. The lack of consideration for both tangible and intangible heritage, alongside a failure to recognise living cultural practices, constitutes a departure from policy requirements.

Ultimately, the combined failure to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application insufficient 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 a critical concern that significantly undermines the evaluation of social impacts, health, and wellbeing associated with the proposal. The developer commissioned this assessment, which included focus groups with local residents, yet the full report remains unpublished. This represents a significant evidential gap that inhibits both public understanding and the competent authority's ability to grasp the full extent of the identified social risks based on the developer’s own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposal. These impacts arise from direct engagement and are based on tangible experiences, not speculation. However, the failure to disclose the complete assessment hampers proper scrutiny of the findings, limiting the capacity to ascertain their significance within the decision-making process.

Furthermore, there is evidence that the proposal is viewed as a direct threat to community identity and cohesion, with the developer’s own findings highlighting “cultural loss.” Despite this identification, the impacts have not been adequately

integrated into the main application nor given appropriate weight. The withholding of the complete Social Impact Assessment obscures the real human and social costs of the development.

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

From a policy standpoint, the application fails to demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Development must facilitate positive health outcomes and mitigate harm, yet existing evidence suggests adverse effects that have not been fully disclosed. Without the complete assessment, demonstrating compliance with this policy is impossible.

The procedural implications of this situation are substantial. The competent authority cannot conduct a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This gap constitutes a material omission within the application and fails to meet the evidential requirements set forth by the Environmental Impact Assessment regime.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to include any evaluation of dark skies and nocturnal wildlife, which represents a significant omission. The coastline of West Lewis is known for its exceptionally dark skies, an essential aspect of its environmental quality, cultural identity, and tourism potential. The proposed development introduces permanent red aviation lighting that is visible over extensive distances, resulting in a continuous and intrusive “wall of light” effect on the western horizon that would drastically change the night-time environment.

There is no consideration of how this lighting would impact visual amenity, landscape character, or the experiences of both residents and visitors. This lack of assessment is particularly concerning given the significance of dark skies to the area's identity and the emerging tourism sector focused on astro-tourism. The failure to address these factors highlights a clear gap in the overall landscape and environmental assessment.

Moreover, the application neglects to evaluate the impacts of this lighting on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can result in disorientation and a higher risk of collisions. Without a

dedicated lighting impact assessment or phototaxis study, the application does not assess how the proposed aviation lighting could affect these species or potentially increase their mortality rates.

This issue is exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to capture nocturnal activities and associated risks. Kittiwakes, for example, may forage or migrate at night and are susceptible to disorientation from artificial lighting; however, this risk has not been evaluated. The absence of site-specific night-time data creates a significant gap in understanding the ecological impacts of the proposal.

Without a thorough assessment of nocturnal impacts, it remains unclear whether protected species or designated sites may face adverse effects. The evidential standard necessary to eliminate adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering lawful determination.

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

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

TOURISM

The analysis of tourism impacts is inadequate and does not assess the economic and social effects on a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscape, dark skies, and sense of seclusion. While the application states that 86% of visitors are attracted by scenery, it lacks a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

The tourism sector has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, providing support for more than 1,000 jobs and making up to 16% of the island's economy. However, the application does not examine how the industrialisation of the seascape and decline in environmental quality could impact Tourism Gross Value Added or the broader economic resilience. Without this analysis, it is impossible to ascertain whether the development would yield a net economic benefit or adversely affect an established and expanding sector.

Furthermore, the assessment neglects the significance of environmental quality in bolstering tourism, including the value of unspoiled landscapes and dark skies for visitor experience, as well as emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment worsens this shortcoming, creating a

considerable gap in understanding the effects on a recognised and growing segment of the local economy.

In an island community with limited economic diversity, the oversight regarding tourism impacts has broader ramifications for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means 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, especially regarding economic impact and the necessity to show net benefit. It also contradicts strategic objectives that highlight tourism as a key growth sector, and it does not furnish adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

Overall, the shortcomings in quantifying tourism impacts, evaluating environmental factors influencing visitor behaviour, and recognising the island's economic dependency lead to a significant evidential gap. This hampers a thorough assessment 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 standards required for sustainable development as set out in statutory duties, national policy, and evidential standards. It revisits the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

There are significant shortcomings in the evidential foundation necessary for a thorough evaluation. The data provided is incomplete, with notable gaps, including reliance on an unspecified design envelope and unelaborated mitigation measures. Additionally, there is a lack of consideration for vital impact pathways, such as nocturnal wildlife, comprehensive onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is inadequate and does not facilitate a full understanding of the likely significant effects or residual impacts.

Procedural issues are also evident, particularly the absence of a compliant Island Communities Impact Assessment, which breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the non-disclosure of the full Social Impact Assessment constitutes a material omission. These failures hinder the ability of the competent authority to assess implications for community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal contradicts the National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural sites, and cultural heritage. It

fails to establish that health and wellbeing impacts are acceptable and lacks evidence of net economic benefit due to insufficient tourism impact modelling. The assessment of cumulative impacts from offshore and onshore activities has not been sufficiently conducted, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks posed by the proposal are uncertain and potentially significant. Evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in parts. The required evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful determination of acceptable impacts.

Additionally, the project is set to cause significant and irreversible changes to a highly sensitive landscape. The industrial development along the Atlantic-facing coastline, loss of dark skies, disruption to cultural and visual connections, and negative impacts on tourism will result in permanent effects that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination. The multitude of information deficiencies, alongside policy conflicts and unresolved environmental risks, precludes a lawful and evidence-based decision. Therefore, it is requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

Objection: Cultural Impact and Misrepresentation

We formally object to the proposed windfarm development on the Isle of Lewis on the basis that it fails to adequately recognise, respect, and protect the cultural and linguistic heritage of the local community, and is therefore contrary to the spirit and intent of Scottish planning policy.

The Isle of Lewis is home to one of Europe's oldest continuous Gaelic-speaking populations. Gaelic here is not an abstract or historic artefact; it is a living community language, embedded within a cultural landscape shaped over millennia. As such, any major industrial development must demonstrate meaningful and demonstrable regard for this context.

As a resident with direct and sustained ties to the local Gaelic-speaking community, including family and cultural connections, I consider myself to have both a legitimate interest and a responsibility to speak to the impacts of this development on indigenous cultural identity and continuity.

In this regard, the developer's decision to apply the Gaelic name Spiorad na Mara ("Spirit of the Sea") to the project is inappropriate and misleading. The use of Gaelic terminology in the absence of clear, evidenced, and ongoing community collaboration

risks creating a false impression of local endorsement. This is particularly concerning where there is significant local opposition.

The instrumental use of Gaelic language and cultural references as part of project branding, without substantive engagement or consent, constitutes a form of cultural misrepresentation. It reduces a living linguistic and cultural tradition to a symbolic device intended to legitimise development, rather than reflecting genuine partnership with the - the definition of cultural appropriation.

This approach is inconsistent with the principles set out in National Planning Framework 4, which emphasises the protection of cultural heritage, community wealth building, and the need for developments to contribute positively to local identity and place. It also runs counter to the objectives of Bòrd na Gàidhlig, which promote the respectful and meaningful use of Gaelic in public life.

Given the above, we submit that the development, as currently presented, fails to demonstrate cultural sensitivity, authenticity of engagement, or compliance with national policy expectations. This raises substantive material considerations which must be afforded significant weight in the determination of this application.

We therefore request that consent 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: DBA5685C

Member of the public 973

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with marine licensing and Environmental Impact Assessment procedures. A thorough review of the Environmental Impact Assessment Report and accompanying materials reveals significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west coast of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns arise regarding the compatibility of the project's scale, proximity, and design with statutory requirements, national policy, and sustainable development principles.

The application lacks a robust evidential basis necessary for a lawful determination. Essential environmental data is missing, baseline information is either limited or inconsistent, and crucial components of the proposal remain undefined. The adoption of a flexible design framework complicates the assessment of likely significant effects, and the reliance on unspecified mitigation measures hampers the evaluation of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive or informed perspective on the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by credible evidence.

There are evident and substantial conflicts with existing policies. The proposal is at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts are critical as they directly pertain to the statutory tests required for consent and challenge the ability of the competent authority to ascertain the development's acceptability from a policy standpoint.

The scale of this proposal is unprecedented for the area, with large turbines sited in close proximity to the shoreline, raising significant concerns about landscape capacity, visual impact, and environmental consequences. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy violations highlight that the application is incomplete and unable to facilitate a lawful determination. In light of these factors, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report suffers from significant deficiencies, leading to an incomplete and unreliable understanding of the potential environmental effects associated with the proposal. The flexibility of the Project Design Envelope, which lacks commitment to precise turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This lack of specificity hinders the application of a worst-case scenario, thereby compromising the assessment's integrity and preventing both the public and competent authorities from fully grasping the true extent of the environmental impacts.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under the premise that environmental harm will be mitigated later obstructs any meaningful evaluation of effectiveness and the assessment of residual impacts. This deferral of crucial information to post-consent stages is procedurally inappropriate and conflicts with the objectives of the Environmental Impact Assessment framework, which necessitates that significant effects and mitigation strategies be clearly identified before determination.

The report also exhibits severe evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such deficiencies result in uncertainty regarding the scale and significance of impacts, especially where negligible or non-significant conclusions are drawn without robust supporting data. This lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that fails to meet statutory requirements.

Consequently, the application does not fulfil the evidential criteria set out in the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially regarding protected species and sensitive habitats. Additionally, the proposal does not align with the National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it has not been demonstrated that impacts have been adequately 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 incomplete. These shortcomings impede a lawful and robust evaluation of environmental effects, leaving the competent authority unable to make an informed determination based on the information available.

ASSESSMENT OF ALTERNATIVES

The application significantly lacks a structured and evidence-based assessment of alternatives, which is a critical requirement under the Environmental Impact Assessment regime. Instead of offering a clear and reasoned comparison of viable alternatives based on their environmental effects, it provides a narrative that merely

recounts the project's development. This failure to adequately explore and identify less harmful options means that more damaging solutions may have been improperly prioritised.

Furthermore, there is a notable absence of a transparent comparison of different offshore locations, scales of development, or design configurations. The application does not convincingly demonstrate that the developer has seriously considered placing turbines further offshore, an approach that would likely mitigate visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline, the lack of analysis on this aspect raises serious concerns about the proposed siting's validity as the least damaging option.

The shortcomings are also evident in the analysis of cable routing and landfall assessments. There is insufficient evidence provided to indicate that alternative routes have been thoroughly investigated to minimise impacts on sensitive receptors, including culturally significant areas such as Barvas Cemetery. The absence of a clear strategy to avoid such impacts, coupled with a lack of comparative analysis, suggests that the design has not incorporated mitigation measures effectively, relying instead on post-design measures that may not sufficiently address the concerns.

Consequently, the application does not demonstrate that environmental harm has been adequately minimised through careful site selection, infrastructure routing, and layout. This oversight represents a failure to adhere to the established mitigation hierarchy, which is essential for ensuring that less harmful and more suitable alternatives are properly evaluated. The absence of a rigorous assessment of alternatives raises doubts about the sustainability and policy compliance of the proposal.

From a policy standpoint, these deficiencies impede compliance with National Planning Framework 4, particularly regarding the preservation of natural environments, cultural heritage, and the well-being of local communities. The lack of a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not undergone sufficient evaluation and thus 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 application presents significant deficiencies in the ornithological assessment, which is riddled with internal inconsistencies and lacks adequate evidence. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already declining, yet the application does not convincingly show that these species will remain unharmed. The development site is situated within key foraging areas and migratory pathways, but the assessment fails to thoroughly analyse the potential impacts of displacement, collision risk, or habitat loss.

A notable contradiction arises within the application, as the developer claims there will be no significant adverse effects while also proposing a Habitats Regulations derogation case. Such a case is only necessary if significant harm is anticipated, raising

doubts about the reliability of the assessment and suggesting that the conclusions drawn are not backed by adequate evidence. Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The critical nature of these feeding grounds is not fully recognised, and reliance on modelling techniques introduces uncertainty, particularly concerning species in critical decline like Kittiwakes and Fulmars. The methods employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the incomplete understanding of behavioural responses.

The placement of turbines in a recognised migratory corridor poses further risks, acting as a barrier within an essential flight path used by species migrating between the United Kingdom and Iceland. The application does not adequately consider the long-term consequences of continued mortality in this corridor or the possible effects on species with small global populations.

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

Additionally, the identified shortcomings reflect a failure to adhere to the National Planning Framework 4, particularly regarding biodiversity protection and the conservation of natural assets. The inability to prove that internationally significant seabird populations will not be adversely affected places the proposal at odds with national policy.

In summary, the assessment is deemed unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. These weaknesses hinder 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 concerning cultural heritage and community identity lacks depth and fails to recognise the West Lewis coastline as a vibrant cultural landscape, where environment, language, tradition, and community are deeply intertwined. Rather than appreciating heritage as a dynamic aspect of community life, the application reduces it to isolated, unchanging assets. This oversimplification overlooks the ongoing social, cultural, and spiritual significance these elements hold for the community.

Particularly concerning is the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active burial grounds and places of spiritual practice; however, the assessment improperly categorises them as mere static features. This mischaracterisation neglects their continued use and significance, as well as the impact of development on their surroundings. Such an

oversight leads to an incomplete understanding of cultural effects and disregards the integral role these sites play in community life.

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the complete Social Impact Assessment raises serious concerns regarding the social impacts, health, and wellbeing of the community. Although the developer engaged local residents through focus groups, the absence of the full report creates a critical evidential gap that hinders public understanding and the competent authority's evaluation of the identified social risks. This lack of transparency not only undermines public trust but also obstructs proper scrutiny of the findings, which are vital for determining their significance in the decision-making process.

Available summaries show that residents are already experiencing significant stress, anxiety, and concern related to the scale and proximity of the proposed development. These impacts, rooted in direct community engagement, are concrete and not

speculative. Additionally, there is evidence that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. However, these critical impacts have not been adequately integrated into the main application or considered with the seriousness they deserve. Consequently, withholding the full assessment obscures the true human and social costs associated with the development.

This lack of transparency further compromises the Environmental Impact Assessment process. For developments of such magnitude, it is essential to fully understand the social, economic, and health implications, especially when community character and functioning are at risk. The omission of the complete dataset within the application denies a comprehensive evidential basis for balancing potential benefits against the associated harms.

From a policy standpoint, the application fails to comply with National Planning Framework 4 regarding health and wellbeing. Development should foster positive health outcomes and mitigate harm; however, the evidence suggests existing adverse effects that remain undisclosed. Without access to the full assessment, it is impossible to demonstrate compliance with this crucial policy.

The procedural ramifications are significant, as the competent authority cannot conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment. This omission constitutes a material failure within the application, breaching the evidential requirements mandated by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, alongside evidence of current adverse impacts, leads to an incomplete and unreliable assessment. This undermines the potential for a lawful determination and firmly indicates that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, landscape, and seascape impacts is inadequate, failing to accurately represent the degree of change and the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, undeveloped nature, and a pronounced sense of remoteness. The proposed large-scale turbines, situated near the shoreline, would establish a continuous industrial presence that fundamentally alters this character, leading to a permanent and irreversible transformation of the landscape.

Moreover, the application does not sufficiently illustrate the extent of this visual change. Due to the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations, adversely affecting visual amenity and diminishing the qualities that define naturalness and remoteness. The assessment does not effectively communicate the level of impact or its significance within the context of this sensitive landscape.

There are significant methodological issues regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the visual impacts have been understated, thereby compromising the reliability of the assessment.

Additionally, the assessment neglects to examine the interconnectedness of landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape context linked visually and spatially to the Atlantic horizon. Treating these sites as isolated entities disregards their interdependence and results in an incomplete evaluation of the impacts on their settings and cultural significance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 concerning the protection of natural spaces and historic assets. The scale of proposed changes is incompatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case scenario assessment further weakens any assertion of policy compliance.

It is evident that the impacts outlined cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and inescapable. Consequently, the resulting changes would be fundamental and permanent, rather than reducible to an acceptable level through mitigation efforts.

In conclusion, the assessment fails to accurately convey the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a dependable evaluation and reinforce the notion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application presents significant concerns regarding the incomplete assessment of construction and pollution risks, which lacks the necessary detail for evaluating potential environmental effects. It involves extensive seabed preparation and installation works in a challenging high-energy Atlantic environment; however, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application relies on the development of mitigation and contingency measures after consent is granted. This approach hinders any meaningful assessment of their sufficiency or effectiveness.

The environmental sensitivity of the receiving area heightens these worries. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disruption and contamination. While the application acknowledges risks such as sediment mobilisation and possible accidental chemical or oil spills, it fails to detail how these risks will be prevented, managed, or monitored effectively.

Moreover, there is considerable uncertainty regarding the scale and behaviour of sediment plumes generated by seabed disturbance and cable installation. Without thorough modelling and clearly articulated management strategies, it remains impossible to ascertain the potential extent, duration, or ecological implications of these impacts. This uncertainty further extends to the possible effects on marine species and habitats identified as sensitive in the broader assessment.

The lack of comprehensive emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable safeguards exist to handle pollution incidents. This deferral introduces procedural risks and diminishes the competent authority's ability to effectively assess environmental protection measures during the determination process.

From a regulatory standpoint, the postponement of essential environmental safeguards is at odds with the stipulations of the Environmental Impact Assessment framework. Assessment of likely significant effects and necessary mitigation must occur prior to consent, and absent such information, a lawful determination cannot be reached. Additionally, the application does not sufficiently demonstrate compliance with policy mandates regarding environmental protection and water quality.

In summary, the combination of undefined mitigation measures, inadequate management plans, and uncertainty around potential impacts leads to a materially deficient assessment. These deficiencies impede a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal lacks a comprehensive and robust assessment of fisheries and marine life, failing to adequately evaluate both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a vital fishing industry. However, the application does not convincingly demonstrate that these habitats and activities can be preserved without substantial disruption.

A crucial concern arises from the assumption that fishing operations can be relocated without negative effects. The application does not provide any evidence that alternative fishing grounds are readily available or can sustain increased pressure. This gap in information is significant, as the potential for overfishing in other areas could have broader economic implications for the local fishing fleet. Without a thorough and

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

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise produced during construction activities. The use of high-energy hammer piling for an extended duration is expected to disturb marine life over considerable distances, notably affecting species such as dolphins. The anticipated disruption to a considerable portion of the local bottlenose dolphin population raises serious issues; however, the application minimises these potential impacts without adequate supporting evidence.

In addition, the application reveals an inconsistency regarding the requirement for licenses to permit harm to European Protected Species, while simultaneously characterising the anticipated impacts as negligible. This contradiction casts doubt on the validity of the assessment and raises concerns about compliance with the Habitats Regulations, especially when harm is anticipated to a level that necessitates legal authorisation.

The assessment neglects to consider the cumulative impacts that may arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without an inclusive analysis of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not meet the requirements of 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 precluding any assertion that the proposal constitutes sustainable development.

Overall, the deficiencies related to the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions within the application render the assessment incomplete and untrustworthy. These shortcomings hinder 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 proposal introduces permanent red aviation lighting that will be visible over long distances, leading to a continuous and intrusive "wall of light" effect across the western horizon. This development fundamentally alters the night-time environment of the West Lewis coastline, which is known for its exceptionally dark skies. Dark skies are essential to the area's environmental quality, cultural identity, and tourism value.

Crucially, there has been no assessment of how this lighting will impact visual amenity,

landscape character, or the experiences of residents and visitors. The omission is particularly concerning given the rising significance of dark skies to local identity and the burgeoning tourism sectors such as astro-tourism. The lack of consideration for these impacts reveals a substantial gap in the overall landscape and environmental assessment.

Furthermore, there is no evaluation of the effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially vulnerable to artificial lighting because of phototaxis, which can result in disorientation and an increased risk of collision. The application lacks a lighting impact assessment or a phototaxis study, failing to evaluate how the aviation lighting may adversely affect these species or contribute to mortality rates.

This oversight is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which neglects to account for nocturnal activities and related risks. 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 absence of site-specific night-time data creates a significant gap in understanding the ecological impacts of the proposal.

Without an evaluation of nocturnal effects, it is impossible to ascertain whether protected species or designated sites may be adversely impacted. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, necessitating the precautionary principle and hindering lawful determination.

Moreover, from a policy perspective, these omissions contradict the National Planning Framework 4 concerning the protection of natural places and environmental quality. This gap also undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is a vital component of the overall ecosystem.

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

TOURISM

The evaluation of the proposed development's impacts on tourism is significantly lacking, as it neglects to analyse the economic and social effects on a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's natural features, including its wild coastline, nearly untouched landscapes, dark skies, and a sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide any quantified assessment of how the introduction of large-scale offshore infrastructure could influence visitor numbers, behaviour, or overall economic contribution to the island.

Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for up to 16% of the local economy. However, the application fails to model how the industrialisation of the seascape and the consequent decline in environmental quality might affect the Tourism Gross Value Added and the broader economic resilience. In the absence of this analysis, it remains unclear whether the proposed development would yield a net economic benefit or potentially harm an established and expanding sector.

Additionally, the assessment overlooks the significance of environmental quality in sustaining tourism, particularly the role of unspoiled landscapes and dark skies in shaping visitor experiences, as well as the potential of emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a notable gap in the understanding of impacts on a recognised and growing segment of the local economy.

Within the context of an island community that has limited economic diversity, the failure to evaluate tourism impacts carries broader implications for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly assessed, which is required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, especially concerning economic impact and the necessity of showing net benefit. Furthermore, it contradicts strategic objectives that highlight tourism as a priority growth sector and fails to provide adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

In summary, the lack of a thorough quantification of tourism impacts, failure to address environmental drivers of visitor behaviour, and disregard for the island's economic dependence culminate in a considerable evidential gap. This gap hinders a comprehensive assessment of economic effects, reinforcing the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as set out by statutory duties, national policy, and evidential standards. It brings to light the same core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a major concern. This new application is presented under an even stronger policy framework, which now emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis for the proposal, marked by critical gaps in baseline data and the ongoing use of an undefined design envelope. The reliance on unspecified mitigation measures is concerning, as is the omission of key impact pathways related to nocturnal wildlife, full onshore infrastructure, and tourism

effects. Consequently, the Environmental Impact Assessment is incomplete and fails to provide a thorough understanding of the likely significant effects or residual impacts of the development.

Procedurally, the application demonstrates clear shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to fully disclose the Social Impact Assessment represents a material omission. These issues hinder the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unfit for determination.

Moreover, the proposal contradicts the National Planning Framework 4. It does not adequately protect biodiversity, natural places, or cultural heritage and fails to demonstrate that health and wellbeing impacts are acceptable. The absence of tourism impact modelling further undermines claims of net economic benefit. The cumulative effects of both offshore and onshore elements have not been properly assessed, obscuring the potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounds the environmental risks associated with the proposal. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain areas, inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and hindering the ability to lawfully conclude that impacts are acceptable.

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 8C874070

Member of the public 974

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is founded on an analysis of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies in planning, environmental, cultural, and procedural areas. Situated off the west side of the Isle of Lewis, the location is characterised by its Atlantic-facing coastline, a nearly untouched environment, and a strong cultural identity. The scale, design, and proximity of the proposal raise crucial questions regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for lawful determination. Key environmental data is absent, baseline information is both limited and inconsistent, and critical elements of the proposal remain unspecified. The flexible design framework used obscures a clear understanding of potential significant effects, while the proposed mitigation measures, which have not been detailed, render it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive or informed understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust evidence.

There are evident and significant conflicts with existing policies. The proposal shows inconsistency with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate that national standards for protecting biodiversity, climate interests, and environmental integrity can be achieved. These conflicts directly relate to the statutory tests necessary for consent and compromise the competent authority's ability to determine the proposal's acceptability within policy frameworks.

The scale of the proposed development is unprecedented for this area, featuring large turbines situated near the shoreline, which introduces substantial concerns regarding landscape capacity, visual dominance, and 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 factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is fundamentally flawed due to significant evidential deficiencies, including gaps in baseline data and limitations in methodology, which rely on assumptions rather than site-specific evidence. This creates uncertainty around the scale and significance of impacts, especially where conclusions suggest negligible or non-significant effects without adequate supporting data. Such inadequacies hinder a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that does not align with statutory requirements.

Moreover, the Environmental Impact Assessment Report is materially deficient, failing to provide a complete, transparent, or reliable overview of the likely environmental effects associated with the proposal. The implementation of a flexible Project Design Envelope, lacking firm commitments to specific turbine dimensions, layouts, or configurations, further complicates the situation by introducing uncertainty. This lack of clarity undermines the integrity of the assessment and means that the impacts described may not truly reflect the development that will be constructed, thereby preventing both the public and the competent authority from fully grasping the environmental implications.

Consent is sought on the basis that environmental harm will be mitigated at a later stage, which is procedurally unacceptable. This approach conflicts with the objective of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures are clearly defined before any determination is made. The absence of defined mitigation measures, monitoring strategies, and management plans further exacerbates the problem, leaving the assessment incomplete and unreliable.

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

In summary, the combination of an undefined design envelope, lack of specified mitigation, and substantial gaps in baseline data leads to an Environmental Impact Assessment Report that is not only incomplete but also unreliable. These deficiencies obstruct a lawful and rigorous evaluation of environmental effects and place 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 provide a structured and reasoned assessment of alternatives, resulting in an inadequacy that does not meet the statutory requirements of the Environmental Impact Assessment regime. Instead of a thorough comparison of realistic alternatives based on their environmental effects, it presents a narrative on project evolution. This approach does not prove that less harmful options have been

properly identified, assessed, and chosen over more damaging solutions.

There is a lack of transparent and evidence-based evaluation of alternative offshore locations, development scales, or design configurations. Notably, the developer has not shown that the possibility of placing turbines further offshore has been seriously considered, which would likely reduce visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline underscores the critical importance of considering proximity to shore when determining potential impact. Without such analysis, it is impossible to conclude that the proposed siting is the least damaging option available.

These shortcomings extend to the assessment of cable routing and landfall. There is insufficient evidence to suggest that alternative routes have been adequately examined to avoid or mitigate impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis indicate 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 appropriate site selection, layout, and routing of infrastructure. This represents a failure to adhere to the established mitigation hierarchy and hinders the competent authority's ability to ascertain whether more suitable and less harmful alternatives exist. Without a comprehensive assessment of alternatives, it cannot be determined that the proposal is sustainable or compliant with policy.

From a policy standpoint, this lack of structured assessment undermines adherence to National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The failure to provide a comparative assessment is a significant omission that leads to the conclusion that the application has not been adequately evaluated and cannot sustain a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species reveals significant deficiencies that undermine its reliability and effectiveness. This coastal environment of West Lewis is particularly sensitive and biologically rich, yet the baseline data presented is inadequate. The methodologies used fail to comprehensively capture the presence, behaviour, and habitat usage of key species. Consequently, this shortfall renders any assessment of impacts to be speculative rather than grounded in solid evidence.

Otters, classified as a European Protected Species, are notably overlooked in this assessment. The application neglects to properly evaluate their active foraging and movement patterns along the coast. The absence of an assessment of their core foraging range means that potential disturbances from construction activities, noise,

and increased human presence have not been sufficiently evaluated. This oversight fundamentally weakens any claims made regarding the lack of significant effects on otters.

In addition, the evaluation of basking sharks suffers from methodological flaws. The reliance on aerial surveys, particularly in challenging Atlantic weather conditions, introduces a significant bias in detection rates. This approach is likely to underestimate the actual presence of basking sharks in the area, especially when juxtaposed with established land-based observations that highlight their frequent utilisation of these waters. Such omissions further compromise the baseline data and diminish the credibility of the conclusions drawn.

The inadequacies in methodology result in conclusions of negligible or non-significant effects that are more reliant on assumptions than on robust scientific evidence. Furthermore, the lack of adequate baseline data hampers the ability to assess cumulative and indirect impacts, seasonal variations, and interactions within the wider ecosystem. This creates a substantial degree of uncertainty regarding the real risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the obligations set out in the Environmental Impact Assessment regime and National Planning Framework 4. The failure to appropriately identify and assess protected species leads to heightened uncertainty, making it impossible to exclude adverse effects beyond reasonable scientific doubt. The application thus engages the precautionary principle, indicating that consent cannot be granted lawfully.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, revealing significant gaps in evidence and inconsistencies that compromise its conclusions. It is essential to recognise that the west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already facing decline. However, the application fails to provide the necessary evidential standard to prove that these species will remain unaffected. The proposed site is situated within critical foraging areas and migratory routes, yet the assessment inadequately evaluates the risks related to displacement, collision, and habitat loss.

Moreover, there exists a crucial contradiction within the application itself, as the developer asserts no significant adverse effects while simultaneously submitting a Habitats Regulations derogation case. Such a derogation is only warranted when significant harm is anticipated. This inconsistency raises serious doubts regarding the

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

The evaluation lacks sufficient evidence to ensure that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not thoroughly addressed, and the reliance on modelling methods injects uncertainty, particularly for species that are already in serious decline, such as Kittiwakes and Fulmars. The methodologies employed may underestimate mortality rates, especially given the incomplete baseline data and the incomplete understanding of behavioural responses.

Additionally, the placement of turbines within a recognised migratory corridor poses another substantial risk, as it effectively obstructs a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to provide a thorough assessment of the long-term consequences of sustained mortality within this corridor or the potential impact on species that have relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold required to ascertain that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, coupled with data deficiencies and limitations in the modelling, signifies that the standard of beyond reasonable scientific doubt has not been satisfied. This situation invokes the precautionary principle and prohibits a lawful conclusion that would support consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is fundamentally lacking, overlooking the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community intertwine. The application employs a narrow perspective, treating heritage merely as a collection of static features instead of recognising their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the assessment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations

for burial and spiritual activities, yet they are regarded as unchanging elements, neglecting their continued significance and the implications of development on their surroundings. This misrepresentation leads to an inadequate understanding of cultural impacts and dismisses their importance in community life.

Moreover, the assessment disregards intangible cultural heritage, including the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These aspects are vital to the area's identity but are conspicuously absent from the evaluation, representing a critical gap. Without acknowledging these factors, the true cultural implications of the proposed development remain obscured.

Concerns also arise regarding community engagement and rights. The Gaelic-speaking community has a distinct cultural identity, characterised as an Indigenous People, yet the necessary process of Free, Prior and Informed Consent has not been undertaken. This lack of genuine engagement compromises the credibility of the assessment and fails to align with established principles concerning participation in decisions that affect cultural and environmental matters.

Another major oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This evaluation is essential for the competent authority to legally assess the social, cultural, and economic repercussions on the island community. Its absence alone prevents a lawful consideration of the proposal.

From a policy standpoint, these inadequacies place the development in direct opposition to the National Planning Framework 4, especially regarding the preservation of historic assets and sites. The failure to account for both tangible and intangible heritage, as well as to recognise active cultural practices, signifies a blatant disregard for policy stipulations.

Overall, the neglect to evaluate living heritage, intangible cultural values, community rights, and compliance with statutory obligations results in a substantial evidential void. The cultural repercussions of the development have not been adequately examined, leaving the application without a sufficient foundation for assessing the genuine cultural consequences of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is a significant concern and undermines the integrity of the evaluation process. The developer commissioned a Social Impact Assessment that involved focus groups with local residents; however, the full report has not been made publicly available. This omission creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to assess the full range of social risks identified through the developer’s own research.

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

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts on the seascape, landscape, and cultural heritage is inadequate and does not accurately portray the scale of change or the sensitivity of the environment. The coastline of West Lewis, characterised by its expansive Atlantic horizon and undeveloped landscape, embodies a profound sense of remoteness. The proposed installation of large turbines near the shoreline would impose a dominant industrial presence that would irreversibly alter this character, resulting in a permanent transformation of the landscape.

Moreover, the application does not sufficiently convey the extent of this visual change. The size and closeness of the turbines would overwhelm views from residential areas, historic sites, and popular coastal locations, thus diminishing visual amenity and compromising the inherent qualities of naturalness and remoteness. The assessment inadequately reflects this impact and overlooks its significance within such a delicate landscape.

Concerns also arise regarding the selection of visual viewpoints, which may not fully encompass the most sensitive receptors or worst-case scenarios, especially regarding important cultural heritage sites and high-value landscapes. This suggests a potential understatement of the visual impact, calling into question the reliability of the assessment itself.

Additionally, there is a lack of analysis concerning the interconnectedness of the landscape, seascape, and cultural heritage. Heritage sites like the Calanais Standing Stones and other Scheduled Monuments are integral to the wider landscape, linked by visual and spatial relationships to the Atlantic horizon. Treating these sites as isolated entities disregards their interdependence, leading to an incomplete assessment of impacts on their setting and cultural importance.

The proposed industrialisation of the seascape threatens to sever these relationships, altering how heritage assets are perceived and disrupting their connection to the natural horizon. This results in not just a visual impact, but a deeper cultural and spatial harm that the application fails to adequately consider.

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

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

In summary, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a trustworthy evaluation, reinforcing the conclusion that the proposal is fundamentally incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks related to the proposal is notably deficient and lacks the necessary detail to assess potential environmental impacts. There will be significant seabed preparation and installation activities in a demanding

Atlantic environment, yet the application does not provide well-defined Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that will be formulated after consent is granted, which hampers any thorough evaluation of their potential effectiveness.

This reliance on unspecified future measures raises serious concerns, particularly due to the delicate nature of the surrounding environment. The West Lewis coastline is home to pristine coastal waters and crucial habitats, both of which are susceptible to sediment disruption and contamination. While the application acknowledges risks, such as sediment mobilisation and accidental spills, it fails to outline adequate strategies for prevention, control, or monitoring of these hazards.

Furthermore, there is ambiguity regarding the scope and dynamics of sediment plumes resulting from seabed disturbances and cable installations. In the absence of comprehensive modelling and clearly articulated management strategies, it is impossible to ascertain the potential extent, duration, or ecological repercussions of these impacts. This uncertainty also extends to the marine species and habitats that have already been identified as sensitive within the broader assessment.

The lack of detailed emergency response procedures only exacerbates these issues. By postponing contingency planning until after consent, the application restricts the ability to assess whether proper safeguards will be in place to manage pollution incidents. This creates procedural risks and compromises the capability of the competent authority to evaluate the environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards stands in conflict with the stipulations of the Environmental Impact Assessment regime. Prior to granting consent, likely significant effects and required mitigations must be thoroughly assessed, and the absence of this information means that a lawful determination cannot be reached. The application also falls short of demonstrating adherence to policy standards concerning environmental protection and water quality.

Collectively, the lack of specified mitigation strategies, inadequate management plans, and the uncertainty regarding potential impacts culminate in a materially deficient assessment. These deficiencies obstruct a credible appraisal of construction and pollution risks and reinforce the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a vital fishing industry, yet the application does not sufficiently evaluate the ecological or socio-economic impacts associated with its proposal. A critical flaw lies in the assumption that fishing activities can be relocated without any repercussions. The lack of evidence regarding the availability and accessibility of alternative fishing grounds raises serious concerns, as any displacement could lead to overfishing in different areas, adversely affecting the local fleet's livelihoods. Without a detailed and evidence-

based assessment, the repercussions on fisheries remain unclear.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise generated during construction. The anticipated high-energy hammer piling over extended periods is expected to cause disturbances that could impact marine life, including dolphins, over considerable distances. The application fails to adequately acknowledge the extent of the predicted disturbance to the local bottlenose dolphin population, thereby downplaying the potential negative effects without robust supporting evidence.

There exists a troubling inconsistency within the application itself, as it simultaneously recognises the necessity for licences to permit harm to European Protected Species while characterising these impacts as negligible. This contradiction casts doubt on the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, especially in cases where harm is expected to require legal authorisation.

Additionally, the assessment neglects to consider the cumulative impacts that arise from various pressures such as habitat disturbance, noise, and the displacement of fishing activities. The absence of a thorough examination of these combined effects means that the overall impact on marine ecosystems and local socio-economic conditions cannot be accurately determined.

From a policy standpoint, the application falls short of demonstrating alignment with National Planning Framework 4 and the National Marine Plan. It does not establish that the proposed development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby failing to support the conclusion that the proposal can be regarded as sustainable development.

In summary, the lack of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the inconsistencies within the application culminate in an assessment that is incomplete and unreliable. These shortcomings hinder a thorough evaluation of the potential effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is significantly lacking, failing to address the full range of impacts associated with this integrated project. The onshore works, including the construction of a substation near Stornoway and cabling across protected moorland, are fundamentally connected to the offshore turbines; however, they are treated separately in the evaluation. This fragmented approach obscures the true environmental and socio-economic effects.

The proposed works entail excavation in areas of deep peat, particularly within Barvas Moor, which is an ecologically sensitive habitat and a vital carbon store. The application does not deliver a thorough assessment of these impacts, hindering a complete understanding of the project's environmental footprint.

By deferring the assessment of onshore impacts, the application fails to facilitate a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be reviewed together. The division between offshore and onshore elements results in a lack of clarity regarding the combined impacts on habitats, peatlands, and local communities.

There are notable risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not prove that these habitats have been fully assessed or that appropriate avoidance measures have been taken, which highlights a significant gap in biodiversity protection.

Concerns also arise regarding the carbon balance, as disturbing peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The application inadequately addresses this concern or shows that the overall carbon balance is beneficial.

Additionally, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence that the required consents or processes have been initiated, prompting doubts about its deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project as a cohesive whole, along with the insufficient demonstration of protection for 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 conclusion, the separation of the project's components, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts leave this portion of the application incomplete and unreliable, 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 presents significant deficiencies in assessing the impacts on tourism, a vital component of the Isle of Lewis economy. This sector relies heavily on the area's wild coastline, nearly untouched landscapes, dark skies, and a sense of remoteness. Despite the application acknowledging that 86% of visitors are attracted by the scenery, it fails to quantify how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contributions of tourism.

Since 2017, tourism has experienced considerable growth, rising from £65 million to over £81.5 million, while supporting more than 1,000 jobs and contributing up to 16% of the island's economy. Nevertheless, the application does not evaluate how the anticipated industrialisation of the seascape and potential loss of environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the island. Without this analysis, it remains unclear whether the development would provide a net economic benefit or jeopardise an established and growing sector.

The significance of environmental quality in enhancing the tourism experience is also overlooked, specifically the value of unspoiled landscapes and dark skies, both of which are crucial for attracting visitors and fostering emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortfall, creating a substantial gap in understanding the impact on a recognised and growing segment of the local economy.

In an island community where economic diversification is limited, the failure to assess tourism impacts has broader ramifications for local employment, businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been addressed in accordance with the requirements set out in the Islands (Scotland) Act 2018.

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

Collectively, the shortcomings in quantifying tourism impacts, analysing environmental factors that influence visitor behaviour, and considering the economic dependency of the island create a substantial evidential gap. This undermines a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm does not meet the requirements for sustainable development according to statutory obligations, national policy, and evidential standards. It raises similar concerns to those that resulted in the refusal of the Lewis Wind Power proposal in 2008, particularly regarding the unacceptable scale of industrialisation. This current application comes under a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidence provided for this application. It lacks comprehensive baseline data and continues to employ an undefined design envelope. Mitigation measures have not been clearly outlined, and key impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, failing to clarify likely significant effects or residual impacts.

Procedural shortcomings are also apparent. The missing Island Communities Impact Assessment violates the statutory duty under the Islands (Scotland) Act 2018, and the incomplete Social Impact Assessment further complicates matters. These issues hinder the competent authority's ability to assess effects on community wellbeing,

cultural identity, and economic resilience, making the application unsuitable for determination.

The proposal contradicts the National Planning Framework 4 by not adequately protecting biodiversity, natural areas, 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 modelling. Moreover, the cumulative impacts of both offshore and onshore components have not been thoroughly evaluated, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

There are uncertainties regarding environmental risks that could be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in certain areas. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and prevents a lawful conclusion regarding acceptable impacts.

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

In summary, the application is unfit for determination both procedurally and substantively. The lack of information, combined with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. Therefore, the competent authority must either refuse consent for this application or invoke the appropriate 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.

Additional Comments

I am against this huge wind farm development which will destroy my ancestral homeland, have an impact on tourism which is a lifeline to local life and the destruction of wildlife and ecosystems. Foreign companies will benefit financially whilst locals will see absolutely no benefitn

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: 69A0A452

Member of the public 975

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 frameworks. The objection arises from a review of the Environmental Impact Assessment Report and associated documentation, highlighting significant deficiencies across planning, environmental, cultural, and procedural aspects. The development is proposed off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, nearly pristine environment, and strong cultural heritage. The design, scale, and proximity of the proposal raise serious concerns about its alignment with statutory obligations, national policy, and sustainable development principles.

The application does not establish an adequate evidential basis for a lawful decision. Critical environmental data is absent, baseline information is insufficient and inconsistent, and essential elements of the proposal remain unclear. The application employs a flexible design framework, which obscures a clear understanding of potentially significant effects, while the reliance on unspecified mitigation measures prevents any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

There are evident and substantial conflicts with policy. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural landscapes, cultural heritage, and health and wellbeing. It does not convincingly demonstrate compliance with national obligations to protect biodiversity, climate considerations, and environmental integrity. These discrepancies directly affect the statutory requirements for consent and impede the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shore, raises significant issues regarding landscape capacity, visual impact, and environmental ramifications. The combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrates that the application is incomplete and unsuitable for lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and fails to provide a complete, transparent, or trustworthy assessment of the potential environmental impacts of the proposal. The reliance on a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This lack of specificity undermines the integrity of the assessment, resulting in a scenario where the impacts discussed may not accurately represent the development that will be constructed. Consequently, both the public and the competent authority are left without a true understanding of the environmental effects involved.

Furthermore, the application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the premise that environmental harm will be addressed later hinders any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. This postponement of critical information to stages following consent is procedurally unacceptable and contradicts the fundamental purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before any determination.

Significant evidential deficiencies also exist, including gaps in baseline data, limitations in methodology, and an overreliance on assumptions rather than site-specific evidence. These shortcomings lead to uncertainty regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are presented without robust supporting data. The lack of adequate information inhibits a clear understanding of cumulative and worst-case impacts, generating scientific uncertainty that fails to meet statutory requirements.

As a result, the application does not fulfil the evidential threshold necessary under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been fully evaluated or that appropriate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application lacks a structured and evidence-based assessment of alternatives, which is essential under the Environmental Impact Assessment regime. Instead of presenting a reasoned comparison of realistic alternatives concerning their environmental effects, it merely recounts the project's development. This narrative

approach fails to demonstrate that less harmful options have been identified and properly evaluated in favour of more damaging ones.

Furthermore, the application does not include a transparent comparison of different offshore locations, development scales, or design configurations. Notably, it does not indicate that the developer has thoroughly explored the option of positioning turbines further offshore, where potential impacts on visual aesthetics, ecology, and the coast could be lessened. The West Lewis coastline's sensitivity and the significant role of proximity to shore in assessing impact mean that the absence of such an analysis undermines any assertion that the proposed siting is the least damaging.

The shortcomings also apply to cable routing and the assessment of landfall, as there is inadequate evidence showing that alternative routes have been investigated to minimise impacts on sensitive areas. This includes regions of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis suggest that mitigation measures by design have not been utilised, relying instead on mitigation strategies after the design phase.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure planning. This oversight signifies a failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to ascertain whether less harmful alternatives are available. Without a thorough assessment of alternatives, it is impossible to conclude that the proposal is sustainable or aligns with policy requirements.

From a policy standpoint, this deficiency raises concerns regarding compliance with the National Planning Framework 4, especially with respect to safeguarding natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that supports the overarching conclusion that the application has not been sufficiently evaluated and cannot receive lawful approval.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is characterised by a highly sensitive and biologically active marine system, yet the assessment of marine ecology and protected species is significantly deficient. There is an incomplete understanding of ecological receptors within this area, primarily due to inadequate baseline data and ineffective methodologies that fail to accurately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

A notable oversight in the application involves otters, which are classified as a European Protected Species. The assessment does not adequately acknowledge their active use of coastal areas for foraging and movement, and it overlooks their core foraging range and behavioural patterns. This omission means that the potential

impacts of construction disturbance, noise, and increased activity have not been properly evaluated, ultimately undermining claims of no significant effects on the species.

Further issues arise with the assessment of basking sharks, which relies heavily on aerial surveys that introduce substantial detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate these waters are frequently used by the species. The failure to incorporate or appropriately consider such information results in an incomplete baseline, thereby diminishing the reliability of the conclusions drawn.

The limitations in these methodologies lead to conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. Additionally, the lack of sufficient baseline data hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty about the actual risks faced by marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4, as the identification and assessment of protected species are inadequate. The uncertainty generated prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these factors, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

A troubling contradiction arises as the developer claims no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment, suggesting that the conclusions drawn are unsupported by the available evidence.

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

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the cultural heritage along the West Lewis coastline is inadequate. It fails to recognise this area as a living cultural landscape, where environment, language, tradition, and community are interconnected. The application treats heritage merely as static assets, rather than acknowledging their active social, cultural, and spiritual functions within the community.

A significant issue is the handling of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active places of burial and spiritual practice, yet they are regarded as static features in the assessment. This oversight neglects their ongoing use, significance, and the potential impact of development on their surroundings, leading to an incomplete evaluation of cultural effects and overlooking their role in community life.

Moreover, the application does not assess intangible cultural heritage, such as the

Gaelic language and traditions, as well as the long-standing connection between the community and the coastal environment. These aspects are vital to the area's identity, yet they are entirely excluded from the assessment, which is a notable omission. The cultural impact of the development cannot be properly understood without considering these factors.

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

A critical failure in procedure is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission prevents a lawful determination.

From a policy standpoint, these shortcomings conflict with National Planning Framework 4, especially regarding the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, along with the failure to recognise living cultural practices, represents a clear deviation from policy requirements.

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and statutory obligations leads to a significant gap in evidence. The cultural impacts of the development have not been adequately 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 transparency surrounding the assessment of social impacts, health, and wellbeing is critically lacking, which raises serious concerns about the validity of the evaluation process. Although the developer engaged local residents through a Social Impact Assessment and conducted focus groups, the absence of the complete report creates a substantial evidential gap. This lack of disclosure hinders both public understanding and the ability of the competent authority to fully grasp the social risks highlighted by the developer's own research.

Residents are reportedly enduring measurable stress, anxiety, and concern due to the scale and proximity of the proposed development, as derived from direct engagement rather than speculation. However, without the full assessment being made public, it becomes difficult to scrutinise these findings effectively and assess their significance in the context of the decision-making process.

Moreover, there are indications that the proposal is viewed as a direct threat to community identity and cohesion, with the potential for “cultural loss” noted in the developer’s findings. Despite these serious implications, they have not been adequately integrated into the primary application or given the necessary weight in consideration. The failure to release the complete Social Impact Assessment obscures the real human and social costs associated with the development.

This lack of transparency has broader implications for the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this magnitude, particularly when they may alter community character and functioning. By withholding the full dataset, the application does not furnish a complete evidential basis to evaluate the balance between potential benefits and harm.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 concerning health and wellbeing. Development should foster positive health outcomes and avoid inflicting harm, yet the evidence that is available points to existing adverse effects that have not been fully revealed. In the absence of the full assessment, it is impossible to demonstrate compliance with this policy.

Procedurally, these concerns are significant. The competent authority is unable to perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission in the application and fails to meet the evidential requirements set by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing adverse effects, results in an incomplete and unreliable assessment. This situation impedes a lawful determination and underscores the conclusion that the application lacks sufficient information to warrant support.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented in the application is fundamentally flawed, failing to accurately represent the seascape, landscape, and visual impacts associated with the proposed development. The West Lewis coastline is characterised by its unspoilt Atlantic horizon and a significant sense of remoteness. The introduction of large-scale turbines near the shoreline would disrupt this character, resulting in a permanent and irreversible alteration to the landscape.

This application does not fully capture the extent of visual change that would occur. Given their scale and proximity, the turbines would overwhelm views from residential areas, historic sites, and popular coastal locations. This would undermine visual amenity and diminish the qualities of naturalness and remoteness that define this sensitive environment. The assessment fails to convey the significance of these impacts adequately, thus misrepresenting the true extent of the threat posed.

Methodological issues also arise regarding the selection of visual viewpoints, which may not effectively represent the most sensitive receptors or worst-case scenarios, particularly concerning vital cultural heritage sites and high-value landscapes. This risk of understating the visual impact significantly compromises the assessment's reliability.

Additionally, the relationship between landscape, seascape, and cultural heritage is not properly evaluated. Significant 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 heritage assets as isolated entities, neglecting their interdependence and thus failing to adequately assess impacts on their cultural significance and setting.

The industrialisation of the seascape would disrupt these vital connections, altering the context in which heritage assets are experienced and severing their links to the natural horizon. This effect represents not just a visual impact but a wider cultural and spatial harm that the application does not sufficiently address.

From a policy standpoint, this proposal contravenes National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of the proposed change does not align with the need to protect landscape character, visual amenity, and the settings of culturally important sites. The lack of a robust worst-case assessment further undermines any claims of compliance with policy requirements.

It is evident that the identified impacts are not capable of effective mitigation. The scale, height, and proximity of the turbines would ensure their dominant presence, making the resulting changes fundamental and permanent rather than manageable through mitigation measures.

Overall, the assessment fails to adequately represent the magnitude of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These significant deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of risks associated with construction and pollution is severely lacking, failing to provide the necessary detail for evaluating the likely environmental effects. The proposal includes significant seabed preparation and installation works in a high-energy Atlantic environment. However, it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans, relying instead on mitigation and contingency measures that are to be formulated after consent is granted. This reliance on unspecified future measures is particularly troubling, given the sensitive nature of the receiving environment.

The West Lewis coastline is home to clean coastal waters and critical habitats that are at risk of sediment disturbance and contamination. Although the application acknowledges potential risks such as sediment mobilisation and accidental chemical or oil spills, it lacks sufficient detail on how these risks will be effectively prevented, controlled, or monitored.

Moreover, there is significant uncertainty surrounding the extent and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it is impossible to ascertain the potential ecological effects or the duration of these impacts. This uncertainty raises additional concerns regarding the impact on marine species and habitats already identified as sensitive in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. The decision to defer contingency planning to a post-consent stage obstructs the evaluation of whether adequate safeguards are in place for responding to pollution incidents. This creates procedural risks and undermines the ability of the competent authority to assess the effectiveness of environmental protection measures at the time of determination.

From a regulatory viewpoint, postponing essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is mandated that significant effects and mitigation measures must be evaluated before consent, and without this information, a lawful determination cannot be achieved. Furthermore, the application fails to demonstrate compliance with policy requirements regarding environmental protection and water quality.

In summary, the deficiencies stemming from the absence of defined mitigation measures, lack of detailed management plans, and the uncertainty of potential impacts lead to a materially inadequate assessment. These shortcomings impede a comprehensive evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents a concerning lack of robust evaluation regarding fisheries and marine life, failing to adequately assess the ecological or socio-economic impacts that may arise from the proposed development. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the application does not convincingly demonstrate how these critical habitats and industries can be preserved or sustained without considerable disruption.

One significant issue lies in the assumption that fishing activities can be displaced without repercussions. The absence of evidence indicating that alternative fishing grounds are both available and capable of accommodating the added pressure is a critical flaw. This oversight has the potential to lead to overfishing in different areas,

which could adversely affect the local fishing fleet's economic stability. Without a thorough and evidence-based evaluation, understanding the impacts on fisheries and livelihoods remains elusive.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The use of high-energy hammer piling over an extended period is expected to disturb marine life across large distances, notably impacting species such as dolphins. The anticipated disruption to a considerable portion of the local bottlenose dolphin population raises serious concerns; however, the application tends to minimise the significance of these impacts without adequate supporting evidence.

There exists an inconsistency within the application itself, acknowledging the requirement for licences to permit harm to European Protected Species while simultaneously describing such impacts as negligible. This contradiction calls into question the credibility of the assessment and raises compliance issues with the Habitats Regulations, especially given the anticipated harm that may necessitate legal authorisation.

Furthermore, the assessment neglects to consider cumulative impacts that could arise from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is vital to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the combination of insufficient evidence regarding fishing displacement, an underestimation of acoustic impacts, and internal inconsistencies renders the assessment inadequate and unreliable. These deficiencies hinder a thorough evaluation of the potential impacts on 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 absence of an assessment of dark skies and nocturnal wildlife is a significant oversight within the Environmental Impact Assessment. The coastline of West Lewis is noted for its exceptionally dark skies, which contribute to environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that will be visible over long distances, leading to a continuous and intrusive “wall of light” effect across the western horizon. This change fundamentally

impacts the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly important given the role of dark skies in the area's identity and the growing sector of astro-tourism. The lack of consideration for these impacts creates a significant gap in the overall landscape and environmental assessment.

Moreover, there is no analysis of the effects on nocturnal wildlife, including species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, all of which are highly sensitive to artificial lighting due to their phototactic behaviour, leading to disorientation and a higher risk of collision. The application does not feature any lighting impact assessment or phototaxis study, which means it cannot evaluate how the aviation lighting may affect these species or increase mortality rates.

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

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

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

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in its ability to meet the standards of sustainable development as required by statutory duties and national policy. It mirrors the key 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 biodiversity, peatland protection, landscape integrity, and community wellbeing, it still fails to address these critical areas adequately.

A major concern is the lack of a complete and reliable evidential basis for the application. There are significant gaps in baseline data, an undefined design envelope is still in use, and there is a heavy reliance on unspecified mitigation measures. Additionally, key impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, have not been adequately addressed. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of the likely significant effects or any residual impacts.

Procedural failures are evident in the application as well. The absence of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the lack of a full Social Impact Assessment represents a substantial omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

Furthermore, the proposal contradicts the National Planning Framework 4, lacking evidence for the protection of biodiversity, natural areas, and cultural heritage. It does not demonstrate that the impacts on health and wellbeing are acceptable, nor does it provide evidence of a net economic benefit due to the absence of tourism impact assessments. The cumulative impacts of both offshore and onshore components have not been appropriately evaluated, leading to a lack of clarity regarding the 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, at times, inconsistent. The evidential threshold required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been satisfied. This engages the precautionary principle, thereby precluding a lawful conclusion regarding the acceptability of the impacts.

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 negative effects on tourism signify permanent impacts that cannot be sufficiently mitigated.

In summary, the application presents both procedural and substantive deficiencies that render it unfit for determination. The extent of the informational gaps, coupled with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision-making process. Therefore, it is requested that the application for the Spiorad na Mara Offshore Wind Farm is refused in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: B3EEB5FC

Member of the public 976

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with the marine licensing and Environmental Impact Assessment regulations. A thorough review of the Environmental Impact Assessment Report and the accompanying documentation reveals several material deficiencies across planning, environmental, cultural, and procedural aspects. The project is located off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of this proposal, alongside its proximity to the shoreline, raise fundamental questions about its alignment with statutory requirements, national policy, and sustainable development principles.

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that compromise its transparency and reliability regarding the environmental implications of the proposal. By employing a flexible Project Design Envelope, which lacks specific turbine dimensions, layouts, or configurations, the report introduces considerable uncertainty. This approach prevents the application of a worst-case scenario, undermining the assessment's integrity and leaving the public and competent authority unaware of the true potential environmental impacts.

Consent is sought based on unformed mitigation measures, monitoring strategies, and management plans. This reliance on undefined measures means that environmental harm may only be addressed after consent is granted, which obstructs any substantive evaluation of their effectiveness or residual impacts. Such deferral of essential information to stages following consent contradicts the intentions of the Environmental Impact Assessment regime, which necessitates the clear establishment of likely significant effects and mitigation strategies before any determination can be made.

Moreover, the assessment suffers from critical evidential gaps, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This lack of concrete information leads to uncertainties regarding the scale and significance of impacts, especially when negligible or non-significant effects are claimed without adequate supporting data. Consequently, the proposal fails to provide a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that is incompatible with statutory requirements.

As a result, 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, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not adhere to National Planning Framework 4, including biodiversity protection and environmental integrity standards, as it cannot be demonstrated that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a highly sensitive and biologically active marine system. However, the assessment of marine ecology and protected species conducted in relation to this area is materially deficient, failing to provide a complete or reliable understanding of the ecological receptors involved. The baseline data is incomplete, and the methodologies employed do not adequately capture crucial information regarding species presence, behaviour, and habitat use. Consequently, the conclusions drawn do not rest on a sound evidential basis for evaluating potential

impacts.

Particularly concerning is the omission of otters, which are a European Protected Species. The application neglects to properly recognise and assess their active use of coastal areas for foraging and movement. This oversight in considering their core foraging range and behavioural patterns means that the potential effects of construction-related disturbance, noise, and increased activity have not been properly evaluated. As a result, the assessment's conclusions regarding the absence of significant effects on otters are undermined.

Further shortcomings arise in the evaluation of basking sharks. The reliance on aerial surveys introduces significant detection bias, especially in Atlantic conditions. This method is likely to underestimate the actual presence of these sharks, particularly when compared to established land-based observations that indicate their frequent use of these waters. The failure to incorporate or adequately consider such data leads to an incomplete baseline and undermines the reliability of the conclusions presented.

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that seriously undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already experiencing declines. However, the application fails to convincingly demonstrate that these species will not be adversely affected. Located within key foraging areas and migratory pathways, the development does not adequately evaluate the implications of potential displacement, collision risks, or habitat loss.

A crucial contradiction arises within the application, wherein the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is necessary only when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn lack adequate support from the underlying evidence. Furthermore, the assessment does not sufficiently prove that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is underrepresented, and the reliance on modelling methods introduces uncertainty, particularly for species such as Kittiwakes and Fulmars, which are already in severe decline. The methodologies employed are likely to underestimate mortality, particularly in light of incomplete baseline data and insufficient understanding of behavioural responses.

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

From a regulatory standpoint, the application does not fulfil the evidential standards required to ascertain no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This engages the precautionary principle, thereby precluding a lawful conclusion in favour of consent.

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The application presents significant procedural implications due to the non-disclosure of the complete Social Impact Assessment. This omission prevents the competent authority from conducting a thorough socio-economic and health evaluation, which is essential for compliance with the evidential requirements of the Environmental Impact Assessment regime.

Furthermore, the assessment of health, social impacts, and wellbeing is significantly deficient, lacking the necessary transparency for a lawful evaluation. Although the developer engaged local residents through focus groups as part of the Social Impact

Assessment, the full report remains unpublished. This represents a critical evidential gap, obstructing both public understanding and the competent authority's grasp of the social risks identified by the developer's own research.

Available summaries reveal that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement with the community and are thus not speculative. Nevertheless, the absence of the full assessment limits the potential for proper scrutiny of these findings, making it challenging to ascertain their significance in the decision-making process.

Moreover, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, the application has not fully integrated these impacts or afforded them appropriate weight, thereby obscuring the true human and social costs associated with the development.

The lack of transparency in disclosing the full dataset undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is paramount for developments of this magnitude, particularly when community character and functioning may be at stake.

From a policy perspective, the application fails to demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. While development should promote positive health outcomes and avoid harm, available evidence indicates pre-existing adverse effects that remain undisclosed. Therefore, without the complete assessment, adherence to this policy cannot be adequately evidenced.

Taken together, the non-disclosure of the complete Social Impact Assessment, alongside existing evidence of adverse impacts, renders the assessment incomplete and unreliable. This situation precludes a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a vital role in defining the area's environmental quality, cultural identity, and tourism potential. However, the Environmental Impact Assessment lacks any evaluation of these dark skies and their significance. The proposed introduction of permanent red aviation lighting, which would be visible over long distances, is set to create a continuous and intrusive "wall of light" effect across the western horizon. This change would significantly alter the night-time environment, yet the application fails to assess the lighting's impact on visual amenity, landscape character, or the experiences of both residents and visitors.

The omission is particularly concerning given the rising importance of dark skies for the local identity and the emerging sector of astro-tourism. Furthermore, the proposal does

not address the potential consequences for nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. Without a lighting impact assessment or a study focused on phototaxis, the application does not adequately consider how the aviation lighting could affect these species or contribute to higher mortality rates.

This failure is exacerbated by the reliance on daytime survey data in the ornithological assessment, which overlooks the nocturnal behaviours and associated risks of the wildlife. For instance, Kittiwakes may forage or migrate at night, making them susceptible to disorientation from artificial lighting, yet this has not been evaluated. The lack of site-specific data related to night-time activity creates a crucial gap in understanding the ecological impacts involved.

Without a thorough assessment of nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites could be adversely impacted. The evidential standard required to eliminate adverse effects beyond reasonable scientific doubt is not met, thus engaging the precautionary principle and preventing a lawful determination.

From a policy standpoint, these omissions are at odds with National Planning Framework 4, which emphasises the need to protect natural places and maintain environmental quality. Additionally, the lack of consideration for night-time character undermines the comprehensive assessment of landscape and seascape impacts.

In summary, the absence of any evaluation of dark skies and nocturnal wildlife represents a substantial evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete, failing to support a lawful determination.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm illustrates significant shortcomings in meeting the standards required for sustainable development, failing to comply with statutory obligations and national policy. The proposal is reminiscent of the previously rejected Lewis Wind Power initiative from 2008, which was deemed excessively industrialised. Despite being presented under a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not address the essential issues identified in the past.

A reliable evidential basis for decision-making is notably absent, with critical gaps in baseline data and an undefined design envelope. The application depends on unspecified mitigation measures, and it neglects to consider key impact pathways such as those affecting nocturnal wildlife, the entirety of onshore infrastructure, and tourism consequences. As a result, the Environmental Impact Assessment is incomplete, hampering a full understanding of the likely significant effects and residual impacts.

The proposal also suffers from procedural deficiencies. Notably, it lacks a compliant Island Communities Impact Assessment, violating the Islands (Scotland) Act 2018, and does not disclose a complete Social Impact Assessment, which is a significant omission. These shortcomings hinder the competent authority's ability to evaluate the implications for community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

In terms of compliance with National Planning Framework 4, the proposal falls short. It fails to safeguard biodiversity, natural landscapes, and cultural heritage, does not adequately assess health and wellbeing impacts, and lacks evidence of a net economic benefit, especially in terms of tourism impact modelling. Furthermore, the cumulative impact of both offshore and onshore components has not been thoroughly evaluated, leaving uncertainties regarding their effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit inconsistencies. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

This proposal would lead to substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline would result in the loss of dark skies, disrupt cultural and visual relationships, and negatively impact tourism, yielding permanent changes that cannot be mitigated effectively.

When considering all these factors, the application emerges as procedurally and substantively unfit for determination. The extensive information deficiencies, coupled with policy conflicts and unresolved environmental uncertainties, obstruct a lawful and evidence-based decision. Therefore, it is imperative that the competent authority either refuse consent for this application or invoke the necessary regulatory provisions to require the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 3662E273

Member of the public 977

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

Dear Sir/Madam

This letter formally objects to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The concerns regarding this proposal stem from its scale, proximity, and design, which raise fundamental issues about its alignment with statutory requirements, national policy, and sustainable development principles.

The application presents significant shortcomings, as it lacks an adequate evidential basis for lawful determination. There are critical gaps in environmental data, and the baseline information provided is limited and inconsistent. Moreover, key elements of the proposal remain undefined. The flexible design framework obscures a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures hinders any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not substantiated by robust evidence.

Substantive policy conflicts are evident, as the proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly relevant to biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not convincingly demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent, undermining the competent authority's ability to determine the development's acceptability in policy terms.

The scale of the proposed development is unprecedented for this location, with large turbines planned in close proximity to the shoreline. This introduces significant concerns related to landscape capacity, visual dominance, and overall environmental impact. When considering the absence of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that undermine its reliability and transparency regarding the likely environmental effects of the proposal. One critical issue is the adoption of a flexible Project Design Envelope,

which lacks specific turbine dimensions, layouts, or configurations. This creates considerable uncertainty and hinders a consistent worst-case scenario application. As a result, the impacts outlined may not accurately represent the development as constructed, limiting both public and competent authority understanding of the true environmental effects.

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

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

Consequently, the application does not satisfy the evidential standard outlined in the Habitats Regulations, which necessitates excluding adverse effects beyond reasonable scientific doubt. This situation necessitates the application of the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, including obligations concerning biodiversity protection and environmental integrity, as it has not been established that impacts have been fully assessed or that suitable safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data contribute to the unreliability and incompleteness of the Environmental Impact Assessment Report. These deficiencies hinder a lawful and robust evaluation of environmental effects, leaving the competent authority unable to make a well-informed determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposal under consideration lacks a comprehensive assessment of marine ecology and protected species, which is essential for understanding the ecological receptors within the West Lewis coastal environment. This region is recognised as a highly sensitive and biologically active marine system. However, the data available is incomplete, and the methodologies employed do not adequately capture the presence, behaviour, or habitat use of various species. Consequently, the assessment does not

provide a reliable evidential basis for evaluating potential impacts.

Notably, the assessment fails to properly identify and assess otters, which are a European Protected Species. There is insufficient recognition of their active use of coastal areas for foraging and movement, and the core foraging range and behavioural patterns of otters have not been adequately considered. This lack of detail means that the potential impacts of construction disturbance, noise, and increased activity on otters have not been thoroughly assessed, undermining any conclusions about the absence of significant effects on this species.

Additionally, there are substantial deficiencies in the assessment of basking sharks, as the reliance on aerial surveys introduces considerable detection bias, particularly in Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider such relevant data results in an incomplete baseline and weakens the reliability of the conclusions drawn.

The methodological limitations present mean that conclusions suggesting negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data also hampers the ability to conduct meaningful assessments of cumulative and indirect impacts, including seasonal variations and interactions within the wider ecosystem. This situation creates uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and the National Planning Framework 4, as there has been a failure to properly identify or assess protected species. The uncertainty introduced by these deficiencies prevents the conclusion that adverse effects can be excluded beyond reasonable scientific doubt, thus engaging the precautionary principle. In light of these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents an ornithological assessment that is fundamentally flawed, characterised by significant evidence gaps and internal contradictions that compromise its findings. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already in decline. However, the application fails to meet the necessary evidential standards to demonstrate that these species will not experience adverse effects. The development

is situated within crucial foraging areas and migratory routes, yet the assessment does not sufficiently examine the potential consequences of displacement, collision risk, or habitat loss.

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

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is recognised as a living cultural landscape where the environment, language, tradition, and community are deeply interconnected. However, the assessment of cultural heritage and community identity fails to acknowledge this

relationship and adopts a reductive view, treating heritage merely as isolated, static assets. This approach neglects their ongoing social, cultural, and spiritual significance within the community.

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

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual and landscape impacts associated with the proposed turbines is fundamentally inadequate, failing to recognise the profound scale of change and the sensitivity of the local environment. The West Lewis coastline is characterised by its open Atlantic horizon and a strong sense of remoteness, which are threatened by the introduction of large-scale turbines situated near the shoreline. Such an industrial

presence would significantly alter the character of the area, leading to a permanent transformation of the landscape.

Furthermore, the application lacks a thorough representation of the extent of visual change. Given their size and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, directly compromising visual amenity and undermining the essential qualities of naturalness and remoteness. This critical impact is not sufficiently conveyed within the assessment, which diminishes the significance of these changes in a sensitive landscape context.

Concerns regarding the methodology used to select and present visual viewpoints also arise, as evidence indicates that certain viewpoints may fail to capture the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been minimised, thus calling into question the reliability of the assessment.

Moreover, the assessment neglects the interconnectedness of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting, connected visually and spatially to the Atlantic horizon. The assessment treats these heritage assets as isolated, which obscures their interdependence and leads to an incomplete evaluation of impacts on their setting and cultural value.

The industrialisation of the seascape would sever the critical connections that enable the appreciation of these heritage sites, altering the context in which they are experienced and disrupting their relationship with the natural horizon. This signifies not only a visual impact but also a deeper cultural and spatial detriment that has not been comprehensively evaluated within the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the safeguarding of natural places and historic assets. The magnitude of change proposed is at odds with the necessity to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further calls into question any assertion of policy compliance.

Lastly, it is evident that the impacts outlined in the proposal cannot be effectively mitigated. Due to the dimensions, height, and closeness of the turbines, their presence would be overpowering and unavoidable, resulting in a fundamental and lasting change that cannot be reduced to an acceptable level through mitigation efforts.

In summary, the assessment inadequately portrays the scale of impact, overlooks the sensitivity of the environment, and fails to recognise the interconnected nature of landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the assertion that the proposal is incompatible with the protection of this significant landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of risks related to construction and pollution is lacking and does not include the necessary detail to evaluate potential environmental effects. The project involves significant seabed preparation and installation activities in a high-energy Atlantic setting, but there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that would be prepared after consent, which hampers any meaningful assessment of their sufficiency or effectiveness.

This dependence on unspecified future measures raises particular concerns, especially considering the sensitivity of the environment. The West Lewis coastline features clean coastal waters and crucial habitats that are at risk of sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and accidental spills of chemicals or oil, it lacks adequate information on how these issues will be prevented, controlled, or monitored.

There is also ambiguity about the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. In the absence of thorough modelling and well-defined management strategies, it becomes impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also pertains to potential effects on marine species and habitats already recognised as sensitive within the broader assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable safeguards are in place to address pollution incidents. This introduces procedural risks and undermines the capability of the competent authority to assess environmental protection measures at the time of decision-making.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the demands of the Environmental Impact Assessment regime. It is necessary to evaluate likely significant effects and mitigation before consent, and without this information, a lawful determination cannot be achieved. Moreover, the application fails to show compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding the assessment of fisheries and marine life, which appears insufficient and lacks a comprehensive evaluation of

ecological and socio-economic impacts. The waters off the West Lewis coast host a diverse marine ecosystem alongside an active fishing industry. However, the application fails to adequately demonstrate how these habitats and uses can be protected or maintained without significant disruption.

A critical issue is the assumption that fishing activity can be displaced without repercussions. There is no evidence provided that alternative fishing grounds exist, are accessible, or can withstand additional pressure. This notable omission is consequential, as such displacement threatens to exacerbate overfishing in other areas and could lead to broader economic implications for the local fishing fleet. Without a thorough and evidence-based assessment, the potential impacts on fisheries and the livelihoods dependent on them remain unclear.

Moreover, the proposal presents considerable risks to marine species, notably through underwater noise produced during construction activities. The use of high-energy hammer piling over extended periods is likely to create disturbances that affect marine life over large distances, with particular concern for species like dolphins. The projected disturbance to a significant proportion of the local bottlenose dolphin population raises serious issues, yet the application appears to downplay the importance of these effects, lacking adequate supporting evidence.

The application exhibits a clear inconsistency by acknowledging the need for licences to permit harm to European Protected Species while simultaneously describing impacts as negligible. This contradiction diminishes the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially where anticipated harm requires legal authorisation.

Furthermore, the assessment does not adequately address cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a holistic evaluation of these interconnected effects, determining the overall impact on marine ecosystems and socio-economic conditions is unfeasible.

From a policy perspective, the application fails to demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which undermines any conclusion regarding the sustainability of the proposal.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the offshore turbines alongside the onshore works is fundamentally lacking and does not account for the full range of impacts related to what is essentially one integrated project. The linkage between the offshore and onshore elements is critical, yet the two are evaluated separately, leading to a disjointed approach that conceals the true extent of the environmental and socio-economic effects.

Onshore developments include the installation of cabling across protected moorland and the construction of a substation near Stornoway, along with necessary access infrastructure traversing sensitive landscapes. These works involve excavation in areas of deep peat, particularly within Barvas Moor, which is a vital carbon store and ecologically significant habitat. The application fails to deliver a thorough assessment of these impacts, obstructing a comprehensive understanding of the project's overall environmental footprint.

By excluding or postponing the evaluation of onshore impacts, the application hinders the accurate assessment of cumulative effects. The Environmental Impact Assessment process necessitates the consideration of all project components in unison; however, the distinct separation of offshore and onshore elements means that the combined repercussions on peatlands, habitats, and local communities are not fully comprehended.

There are considerable risks posed to sensitive habitats, including machair systems and peatland environments, which are protected under policy measures. The application lacks evidence demonstrating that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures are in place. This results in a significant evidential gap regarding the protection of biodiversity.

Concerns about carbon balance also arise from the proposal. Disturbing peatland can release stored carbon, potentially leading to a carbon debt that undermines the aims of renewable energy initiatives. The application does not sufficiently tackle this concern or show that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application does not furnish evidence that the necessary consents or processes have been undertaken, casting doubt on the project's deliverability and lawful execution.

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

Overall, the disconnection between project components, the lack of a comprehensive assessment, and the absence of evidence concerning environmental and land use impacts leave this part of the application incomplete and unreliable, obstructing a lawful determination.

TOURISM

The proposal presents a serious deficiency in assessing tourism impacts, neglecting to evaluate the economic and social ramifications for a crucial sector of the Isle of Lewis economy. The success of tourism is inherently linked to the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application recognises that 86% of visitors are motivated 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.

Tourism on the island has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. Despite this growth, the application does not explore how the industrialisation of the seascape and the deterioration of environmental quality would affect Tourism Gross Value Added or the broader economic resilience of the area. In the absence of such analysis, it remains unclear whether the development would yield a net economic benefit or jeopardise a well-established and expanding sector.

Additionally, the assessment overlooks the significance of environmental quality in enhancing tourism, particularly regarding unspoiled landscapes and dark skies, which are essential for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, resulting in a significant gap in understanding impacts on an acknowledged and growing component of the local economy.

Given the context of an island community with limited economic diversification, the failure to assess tourism impacts holds broader implications for employment, local enterprises, and community sustainability. The omission 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 compliance with National Planning Framework 4, especially concerning economic impact and the necessity to show net benefit. It also contradicts strategic objectives that classify tourism as a priority growth sector and lacks adequate evidence to enable the competent authority to evaluate the economic consequences of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, assessing environmental influences on visitor behaviour, and acknowledging the island's economic dependency create a considerable evidential gap. This absence hampers 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 fails to meet the essential criteria for sustainable development as required by statutory duties, national policy, and evidential standards. It mirrors the fundamental concerns that led to the rejection

of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. This current application, while submitted under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, still does not adequately address these issues.

There are significant shortcomings in the evidential basis for the application. Critical gaps in baseline data exist, alongside the continued use of an undefined design envelope and reliance on unspecified mitigation measures. Additionally, there are omissions concerning key impact pathways, including effects on nocturnal wildlife, the complete onshore infrastructure, and potential tourism implications. As a result, the Environmental Impact Assessment remains incomplete, hindering a comprehensive understanding of likely significant effects or any residual impacts.

The application also presents clear procedural failures. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment represents a material omission. These deficiencies obstruct the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

This proposal contradicts the directives of National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, or cultural heritage, nor does it establish that health and wellbeing impacts are acceptable. Furthermore, the absence of tourism impact modelling means that a net economic benefit cannot be evidenced. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring their impact on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project remain uncertain and potentially significant. Assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The required evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thus engaging the precautionary principle and barring a lawful conclusion regarding acceptable impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The extent of informational deficiencies, coupled with conflicts in policy and unresolved environmental risks, obstructs a lawful, evidence-based decision. The competent authority is urged to either refuse consent based on these grounds or invoke 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.

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: 234565B7

Member of the public 978

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 frameworks. The objection arises from a review of the Environmental Impact Assessment Report and associated documentation, highlighting significant deficiencies across planning, environmental, cultural, and procedural aspects. The development is proposed off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, nearly pristine environment, and strong cultural heritage. The design, scale, and proximity of the proposal raise serious concerns about its alignment with statutory obligations, national policy, and sustainable development principles.

The application does not establish an adequate evidential basis for a lawful decision. Critical environmental data is absent, baseline information is insufficient and inconsistent, and essential elements of the proposal remain unclear. The application employs a flexible design framework, which obscures a clear understanding of potentially significant effects, while the reliance on unspecified mitigation measures prevents any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

There are evident and substantial conflicts with policy. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural landscapes, cultural heritage, and health and wellbeing. It does not convincingly demonstrate compliance with national obligations to protect biodiversity, climate considerations, and environmental integrity. These discrepancies directly affect the statutory requirements for consent and impede the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shore, raises significant issues regarding landscape capacity, visual impact, and environmental ramifications. The combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrates that the application is incomplete and unsuitable for lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies within the Environmental Impact Assessment Report are substantial, as it fails to furnish a comprehensive, transparent, and dependable account of the potential environmental impacts associated with the proposal. The reliance on a flexible Project Design Envelope, which does not commit to definitive turbine dimensions, layouts, or configurations, introduces considerable uncertainty and obstructs the consistent application of a worst-case scenario. This lack of specificity compromises the integrity of the assessment and precludes both the public and the competent authority from grasping the actual extent of the environmental effects that may arise.

Furthermore, the application is heavily predicated on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consequently, consent is being requested with the expectation that any environmental harm will be addressed subsequently, which undermines the ability to conduct a meaningful evaluation of effectiveness or to assess residual impacts. This postponement of vital information to post-consent phases is procedurally untenable and contravenes the objectives of the Environmental Impact Assessment framework, which stipulates that significant effects and mitigation must be unequivocally established prior to determination.

Evidential deficiencies also abound, encompassing gaps in baseline data, limitations in methodology, and the use of assumptions rather than site-specific evidence. Such issues lead to uncertainty surrounding the magnitude and significance of impacts, especially where conclusions of negligible or non-significant effects are presented without adequate supporting data. The lack of sufficient information hinders a clear comprehension of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot be reconciled with statutory obligations.

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, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it remains unproven that impacts have been thoroughly assessed or that suitable safeguards are in place.

In conclusion, the interdependence on an undefined design envelope, the absence of specified mitigation strategies, and the shortcomings in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and thorough assessment of environmental impacts, placing the competent authority in a position where it cannot make an informed determination based on the information submitted.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate and fails to provide a comprehensive understanding of ecological receptors in the West Lewis

coastal environment. This area is sensitive and biologically active, yet the baseline data is incomplete, and the methodologies used do not sufficiently capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

One major oversight concerns otters, which are a European Protected Species. The application does not appropriately recognise or assess their active use of coastal regions for foraging and movement. The failure to consider their core foraging range and behavioural patterns means the possible impacts of construction disturbance, noise, and increased activity have not been adequately evaluated. This significantly weakens any conclusions drawn about the absence of significant effects on this species.

There are also serious shortcomings in the assessment of basking sharks. Relying on aerial surveys introduces a significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The neglect to incorporate or properly consider such relevant data leads to an incomplete baseline and undermines the reliability of the conclusions presented.

These methodological flaws mean that the conclusions of negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of sufficient baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This results in uncertainty regarding the true extent of risk 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 protected species have not been properly identified or assessed. The uncertainty introduced precludes the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, consent cannot be granted lawfully.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application for the proposed development is fundamentally flawed, particularly in its ornithological assessment, which contains significant gaps in evidence and internal inconsistencies that compromise its conclusions. The site is situated along the west coast of the Isle of Lewis, an area recognised for its internationally important seabird populations, many of which are already in decline. However, the application fails to adequately demonstrate that these species will not suffer adverse effects. Key foraging areas and migratory pathways are within the development's location, yet the

assessment does not properly evaluate the risks associated with displacement, collision, or habitat loss.

A glaring contradiction is present in the application, as the developer claims there will be no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, which is typically invoked only in instances where significant harm is anticipated. This inconsistency raises serious questions about the assessment's reliability and suggests that the conclusions drawn are not supported by robust evidence. Furthermore, the assessment lacks sufficient evidence to ensure that seabirds linked to protected sites like the Lewis Peatlands and St Kilda will remain unaffected. The crucial nature of these feeding grounds has not been fully acknowledged, and the reliance on modelling introduces uncertainty, particularly for species such as Kittiwakes and Fulmars, which are in severe decline. The methodologies used are likely to underestimate mortality rates, especially in light of incomplete baseline data and a lack of comprehensive understanding regarding behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional, significant risk, as it effectively creates a barrier along 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 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 threshold necessary to assert that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, along with data gaps and modelling deficiencies, indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This invokes the precautionary principle, thereby preventing a lawful conclusion in favour of consent.

The identified deficiencies also signify 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 impacted places the proposal in direct opposition to national policy.

In summary, the assessment is unreliable due to internal inconsistencies, methodological flaws, and insufficient evidence. These shortcomings hinder a thorough evaluation of impacts and contribute to the overall 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 seriously lacking. It does not acknowledge the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are closely interconnected. Instead, the application simplifies heritage, viewing it as a collection of isolated, unchanging assets. This perspective ignores the ongoing social, cultural, and spiritual functions

these elements have within the community.

A significant shortcoming is the handling of culturally significant sites like the cemeteries at Dalmore, Bragar, and Barvas. These places are active sites of burial and spiritual practice; however, the assessment wrongly categorises them as static features. It fails to take into account their continued use and the impact of development on their surroundings. Such mischaracterisation leads to an incomplete understanding of cultural effects and neglects their importance to community life.

Moreover, intangible cultural heritage is overlooked. Elements such as the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment are vital to the area's identity yet are entirely absent from the assessment. This gap means the cultural impact of the proposed development cannot be fully understood.

Community rights and engagement also raise concerns. The Gaelic-speaking population embodies a distinct cultural identity with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's validity and disregards established principles of participation in decisions affecting cultural and environmental interests.

Furthermore, there is a critical procedural failure, as a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018, has not been conducted. Without this assessment, the competent authority cannot legally evaluate the social, cultural, and economic impacts on the island community. This omission alone renders any determination of the proposal unlawful.

From a policy standpoint, these failures conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect to consider both tangible and intangible heritage and to recognise living cultural practices marks a clear deviation from policy requirements.

When viewed collectively, the shortcomings in assessing living heritage, intangible cultural value, community rights, and statutory obligations create a substantial evidential gap. The cultural impacts of the development remain unassessed, and the application does not offer a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The transparency surrounding the assessment of social impacts, health, and wellbeing is critically lacking, resulting in a deficient evaluation. The developer undertook a Social Impact Assessment that included focus groups with local residents; however, the complete report remains unpublished. This significant evidential gap hinders both the public and the competent authority from fully grasping the social risks highlighted by the developer's own research.

Residents are reportedly experiencing stress, anxiety, and concern due to the scale and proximity of the proposed development. These effects are based on direct engagement, rendering them non-speculative. Nevertheless, the failure to disclose the full assessment limits proper scrutiny of these findings and obstructs the ability to evaluate their relevance in the decision-making process.

Moreover, there is evidence that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" identified in the developer's findings. Unfortunately, these significant impacts have not been sufficiently integrated into the primary application or afforded the necessary consideration. The withholding of the complete Social Impact Assessment obscures the true social and human costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is vital for projects of this magnitude, especially when the character and functioning of the community could be at stake. The failure to provide the full dataset means that the application does not offer a complete evidential basis for evaluating the balance between benefits and potential harm.

From a policy standpoint, the application does not comply with National Planning Framework 4 regarding health and wellbeing. Development should facilitate positive health outcomes and mitigate harm; yet, the evidence available suggests existing adverse effects that have not been thoroughly disclosed. Without the complete assessment, demonstrating compliance with this policy is impossible.

The procedural implications are considerable. The competent authority cannot conduct a robust socio-economic and health evaluation without access to the entire Social Impact Assessment. This omission is significant within the application and constitutes a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, in conjunction with evidence of existing adverse impacts, renders the assessment both incomplete and unreliable. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information.

CONSTRUCTION AND POLLUTION RISKS

The application lacks the necessary detail to assess environmental impacts, particularly concerning construction and pollution risks. There is a significant reliance on future mitigation and contingency measures that are to be developed after consent, which raises immediate concerns about the adequacy and effectiveness of such plans. This is especially troubling given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to disturbance and contamination from sediment.

Risks associated with sediment mobilisation and accidental spills of chemicals or oil have been acknowledged in the application; however, there is insufficient information on how these risks will be managed, controlled, or monitored. Furthermore, there is considerable uncertainty regarding the nature and scale of sediment plumes that may result from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the potential ecological effects, duration, or extent of these impacts. This uncertainty also applies to marine species and habitats that are already recognised as sensitive within the broader assessment.

The shortcomings are exacerbated by the absence of detailed emergency response procedures. By postponing contingency planning until after consent, the application undermines the ability to evaluate whether adequate measures are in place to address pollution events. This creates procedural risks and limits the competent authority's capacity to assess environmental protection effectively at the point of determination.

From a regulatory standpoint, this deferral of critical environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. It is essential that significant effects and mitigation measures be evaluated before consent is granted, and the lack of such information means that a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with essential policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The assessment of fisheries and marine life lacks depth and fails to provide a thorough evaluation of ecological or socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the application does not adequately demonstrate how these uses and habitats can be protected or maintained without causing significant disruption.

A critical concern is the assumption that fishing activities can be displaced without consequences. The application does not supply evidence indicating that alternative fishing grounds are available, accessible, or capable of bearing additional pressure. This omission is crucial, as displacement could lead to overfishing in other areas and may result in broader economic ramifications for the local fishing fleet. Without a clear, evidence-based assessment, the impacts on fisheries and livelihoods remain inadequately understood.

The proposal raises considerable risks for marine species, particularly due to the

underwater noise generated during construction. The high-energy hammer piling anticipated over an extended duration is expected to disturb marine life across considerable distances, affecting species such as dolphins. The projected disturbance to a significant portion of the local bottlenose dolphin population is alarming; however, the application downplays these effects without adequate supporting evidence.

There exists a clear inconsistency in the application, where the necessity for licences to permit harm to European Protected Species is acknowledged, yet the impacts are simultaneously characterised as negligible. This contradiction undermines the assessment's credibility and raises concerns regarding adherence to the Habitats Regulations, especially in cases where harm is anticipated at a level that necessitates legal authorisation.

Moreover, the assessment overlooks 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 ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and unreliable. These shortcomings obstruct a rigorous 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 proposal fails to include any assessment of dark skies and nocturnal wildlife, which constitutes a material omission in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, an important aspect of environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting will be visible over long distances, creating a continuous and intrusive "wall of light" across the western horizon, thereby fundamentally altering the night-time environment.

The application neglects to evaluate how this lighting will affect visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is significant considering the value of dark skies to the area's identity, particularly as emerging sectors like astro-tourism gain importance. The absence of such assessments represents a clear gap in the overall landscape and environmental evaluation.

Moreover, there is no examination of potential 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 cause

disorientation and increase the risk of collisions. The lack of a lighting impact assessment or phototaxis study prevents an understanding of how aviation lighting might affect these species or lead to increased mortality rates.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activities and associated risks. Kittiwakes, for instance, may forage or migrate at night and are vulnerable to disorientation from artificial lighting; yet, this risk has not been addressed. The absence of site-specific night-time data results in a critical shortfall in understanding the ecological impacts involved.

Without an assessment of these nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites might be adversely affected. The requisite evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt cannot be satisfied, thereby invoking the precautionary principle and preventing a lawful determination.

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

In conclusion, 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 application presents significant deficiencies in its assessment of tourism impacts, neglecting to evaluate both the economic and social consequences for a crucial sector of the Isle of Lewis economy. It is vital to recognise that tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and 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 the proposed large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution from tourism.

Tourism on the Isle of Lewis has experienced substantial growth, with its value 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. Despite this positive trend, the application does not adequately model the potential impact of industrialising the seascape or the loss of environmental quality on Tourism Gross Value Added and overall economic resilience. Without this crucial analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an established and burgeoning sector.

Furthermore, the assessment overlooks the critical role that environmental quality plays in bolstering tourism. It fails to consider the significance of unspoiled landscapes and dark skies for the visitor experience, particularly for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this inadequacy, leaving a considerable gap in understanding the impact on a recognised and expanding segment of the local economy.

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

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4, especially concerning economic impact and the necessity to show net benefits. It contradicts strategic objectives that designate tourism as a priority growth sector and does not furnish adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

In summary, the deficiencies in quantifying tourism impacts, assessing environmental factors that influence visitor behaviour, and considering the island's economic dependency result in a significant evidential gap. This lack of thorough analysis obstructs a comprehensive 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 signifies a profound failure to meet the criteria for sustainable development in light of statutory obligations, national policy, and evidential standards. It revisits the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. This current proposal is now submitted under a more robust policy framework that places heightened emphasis on biodiversity, peatland conservation, landscape integrity, and community wellbeing.

The submission lacks a comprehensive and reliable evidential foundation necessary for a proper determination. Notable gaps exist in baseline data, the continued reliance on an unspecified design envelope, unclarified mitigation measures, and a failure to address significant impact pathways, including nocturnal wildlife, complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a clear understanding of the likely significant effects or any residual impacts.

Procedurally, there are evident failures present. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to present the complete Social Impact Assessment represents a critical omission. Such deficiencies hinder the competent

authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

There remains a degree of uncertainty regarding environmental risks that could be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in places. The evidential standard required to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, thus engaging the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

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

Taken collectively, the application is both procedurally and substantively inadequate for determination. The extent of informational deficiencies, along with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority is compelled to either refuse consent based on these grounds or invoke appropriate regulatory measures to mandate the submission of the required information.

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

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: AD74AA26

Member of the public 979

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

Dear Sir/Madam

This letter presents a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A thorough examination of the Environmental Impact Assessment Report and the accompanying documentation reveals significant deficiencies across multiple areas, including planning, environmental factors, cultural considerations, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns arise regarding the compatibility of the scale, proximity, and design of the proposal with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential foundation necessary for a lawful determination. There is a notable absence of critical environmental data, the baseline information presented is limited and inconsistent, and essential components of the proposal remain unspecified. The flexible design framework employed hampers a clear understanding of the potential significant effects, while the dependence on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, thereby undermining claims of negligible or non-significant effects due to the lack of robust evidence.

Substantive conflicts with existing policy frameworks are evident. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, addressing climate interests, and maintaining environmental integrity. Such conflicts directly impact the statutory tests necessary for consent and weaken the competent authority's ability to determine the development's policy acceptability.

The proposal's scale is unprecedented for this location, featuring large turbines placed in close proximity to the shoreline, which raises significant issues regarding landscape capacity, visual dominance, and overall environmental impact. Collectively, the deficiencies in information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and inadequate 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 inadequate. It does not offer a clear or trustworthy account of the likely environmental effects of the proposed development. The use of a flexible Project Design Envelope, which lacks commitment to specific turbine sizes and layouts, creates considerable uncertainty. This uncertainty hinders a consistent worst-case scenario application and undermines the assessment's integrity. As a result, the potential impacts presented may not accurately reflect the final development, limiting both public understanding and that of the competent authority regarding the true extent of environmental effects.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application exhibits significant deficiencies in its assessment of alternatives, failing to satisfy the statutory requirements of the Environmental Impact Assessment regime. It does not provide a structured and reasoned comparison of feasible alternatives based on their environmental impacts. Instead, it offers a narrative account of project development, which does not adequately demonstrate that less harmful options have been identified, evaluated, and selected over more damaging alternatives.

There is a notable absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has genuinely considered the possibility of situating turbines further offshore, where the associated visual, ecological, and coastal impacts would likely be lessened. Considering the sensitivity of the West Lewis coastline, and the crucial role that proximity to shore plays in assessing impact, the lack of this analysis hinders any conclusion that the proposed location is the least damaging option available.

Furthermore, these inadequacies extend to the evaluation of cable routing and landfall assessment. There is insufficient evidence demonstrating 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, along with the absence of comparative analysis, implies that mitigation through design has not been implemented, resulting instead in a reliance on post-design mitigation measures.

Consequently, the application fails to show that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This oversight represents a disregard for the established mitigation hierarchy, which obstructs the competent authority's ability to ascertain whether there are less harmful and more suitable alternatives available. The omission of a robust alternatives assessment precludes the conclusion that the proposal is a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species is fundamentally inadequate, failing to deliver a thorough and reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is recognised as a highly sensitive and biologically rich marine system, yet the baseline data provided is incomplete. The methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species, leading to an assessment that does not offer a credible evidential basis for evaluating potential impacts.

Particularly concerning is the omission regarding otters, which are classified as a European Protected Species. The application does not adequately acknowledge or assess their active utilisation of coastal areas for both foraging and movement. Consequently, this oversight results in a lack of analysis concerning their core foraging range and behavioural patterns. The potential impacts from construction disturbance,

noise, and increased activity have therefore not been thoroughly evaluated, undermining any assertions made about the absence of significant effects on this species.

Additionally, the assessment of basking sharks presents further shortcomings, as it relies heavily on aerial surveys that introduce considerable detection bias, especially under Atlantic conditions. This methodology is likely to significantly underestimate the presence of basking sharks, especially when compared to established land-based observations that demonstrate their frequent use of these waters. The failure to adequately incorporate or consider such data culminates in an incomplete baseline, thereby diminishing the reliability of the conclusions drawn.

Given these methodological shortcomings, conclusions stating negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data inhibits a meaningful evaluation of cumulative and indirect impacts, encompassing seasonal variations and broader ecosystem interactions. This introduces uncertainty concerning the true scale of risk posed to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development on the west coast of the Isle of Lewis poses significant risks to internationally important seabird populations that are already declining. The ornithological assessment associated with this application is fundamentally flawed. It has notable gaps in evidence and internal inconsistencies that seriously undermine its conclusions. The area is known for its key foraging zones and migratory pathways, yet the assessment fails to adequately evaluate the impacts of displacement, collision risk, or habitat loss for these species.

There is a critical contradiction in the application. The developer claims that there will be no significant adverse effects, while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that its conclusions are not backed by sufficient evidence.

Furthermore, the assessment does not convincingly show that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. It does not fully consider the importance of these feeding grounds, and its reliance on modelling approaches adds further uncertainty, particularly regarding species in severe decline like Kittiwakes and Fulmars. Methodologies employed appear likely to underestimate mortality rates, especially in situations where baseline data is incomplete and the behavioural responses of the species are not well understood.

The siting of turbines within a known migratory corridor adds another significant risk. This creates a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently analyse the long-term consequences of ongoing mortality in this corridor, nor does it assess the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential requirements needed to affirm no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicate that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, making it impossible to lawfully conclude in favour of consent.

Moreover, the identified deficiencies show a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be adversely affected directly conflicts with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage in the application is severely lacking, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, tradition, language, and community are interwoven. The approach adopted is overly simplistic, treating heritage as a collection of isolated and static assets, disregarding their ongoing social, spiritual, and cultural significance within the community.

Particularly concerning is the treatment of important cultural sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are not merely static features; they are active sites of burial and spiritual practice. However, the assessment reduces them to mere objects, ignoring their continued significance, meaning, and the potential impact of development on their surroundings. This misrepresentation leads to an incomplete understanding of cultural effects and dismisses their importance in the

lives of the community.

Moreover, the application overlooks intangible cultural heritage, including the Gaelic language and longstanding community ties to the coastal environment. These aspects are crucial to the area's identity but are completely absent from the assessment, constituting a significant oversight. The failure to acknowledge these elements means that the cultural implications of the development cannot be fully grasped.

Concerns extend to the rights and engagement of the community. The Gaelic-speaking population embodies a distinct cultural identity recognised as characteristic of Indigenous Peoples. Yet, there has been no process of Free, Prior and Informed Consent. This lack of meaningful involvement not only weakens the validity of the assessment but also fails to uphold the established principles of community participation in decisions affecting cultural and environmental interests.

Furthermore, a serious procedural oversight is the failure to provide 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 cannot meet its legal obligation to assess the social, cultural, and economic impacts on the island community. This alone renders a lawful determination impossible.

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

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory responsibilities culminates in a considerable evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not present a solid foundation for understanding the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is a significant concern. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report has not been made available. This lack of access creates a substantial evidential gap, which hinders the public and the competent authority from fully grasping the range of social risks identified through the developer’s own research.

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

framework.

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly lacking and does not reflect the sensitivity of the environment or the scale of change adequately. The West Lewis coastline, characterised by an open Atlantic horizon and an undeveloped character, offers a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create an overwhelming industrial presence that would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

The application fails to accurately represent the extent of visual change. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would have a direct impact on visual

amenity, eroding the essential qualities of naturalness and remoteness. The assessment does not properly convey the significance of this impact, especially within such a sensitive landscape.

Concerns arise over the selection and presentation of visual viewpoints in the assessment. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly in relation to significant cultural heritage sites and valuable landscapes. This raises the possibility that the magnitude of visual impact has been underestimated, which undermines the reliability of the assessment.

Moreover, the application fails to evaluate the interconnected relationship between landscape, seascape, and cultural heritage effectively. Important sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as isolated assets, neglecting their interdependence and resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and severing their link to the natural horizon. This represents not only a visual impact but also a broader cultural and spatial harm that has not been thoroughly evaluated within the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the protection of natural places and historic assets. The extent of change proposed is incompatible with the need to safeguard landscape character, visual amenity, and the context of culturally significant sites. The lack of a robust worst-case assessment further undermines the claim of compliance with policy.

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

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 deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal includes extensive seabed preparation and installation works in a high-energy Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are intended to be developed after consent, which hampers any meaningful assessment of their sufficiency or effectiveness. This approach raises significant concerns, particularly given the sensitivity of the surrounding environment.

The West Lewis coastline features clean coastal waters and important habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to detail how these risks will be prevented, controlled, or monitored.

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

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

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

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the assessment of fisheries and marine life within the application is inadequate and lacks a thorough evaluation of both ecological and socio-economic impacts. A key concern is the assumption made in the application that fishing activities can be displaced without any consequences. There is no evidence presented to support the availability or accessibility of alternative fishing grounds that can withstand additional pressure. This significant omission raises the risk of overfishing in other areas, which may have broader economic repercussions for the local fishing fleet. Consequently, without a clear, evidence-based assessment, the implications for fisheries and livelihoods remain poorly understood.

Furthermore, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during the construction phase. The prolonged high-

energy hammer piling is likely to cause disturbances over considerable distances, impacting species such as dolphins. Concerns arise from the predicted disturbance to a considerable portion of the local bottlenose dolphin population, yet the application tends to downplay these effects, lacking sufficient supporting evidence.

Additionally, there is an inconsistency within the application itself, as it acknowledges the need for licences to permit harm to European Protected Species while simultaneously describing the impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Moreover, the assessment neglects to consider cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. The absence of a comprehensive evaluation of these combined effects hinders any determination of the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed assessment of the onshore infrastructure is fundamentally incomplete and neglects to address the full extent of impacts associated with this integrated project. The offshore turbines and onshore works are closely interconnected, yet they are evaluated separately, leading to a disjointed approach that conceals the overall environmental and socio-economic repercussions.

The onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and necessary access routes through sensitive landscapes. These activities involve excavation through deep peat areas, particularly in Barvas Moor, which is an important carbon store and ecologically delicate habitat. The application falls short in delivering a thorough assessment of these impacts, thereby hindering a complete understanding of the project's 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 facets of a project be considered collectively; however, the division between offshore and onshore components prevents a comprehensive understanding of their combined impacts on peatlands, habitats, and communities.

Moreover, there are considerable risks to sensitive habitats, such as machair systems and peatland environments, which are protected 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. This results in a significant evidential gap regarding biodiversity protection.

Concerns also arise relating to carbon balance. Disturbing peatland releases stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this matter or demonstrate that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is no evidence provided that the required consents or processes have been initiated, which casts doubt on the project's feasibility and legal compliance.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

Equally concerning is the lack of assessment regarding the impacts on nocturnal

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

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

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

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

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

SUMMARY

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

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

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

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

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

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

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

Additional Comments

A balanced objection to the proposed offshore wind farm near the Isle of Lewis should recognise both the urgent need for renewable energy and the legitimate local concerns associated with large-scale development in a sensitive environment.

While offshore wind is an important component of the UK’s transition to low-carbon energy, the scale and location of this proposal raise significant issues. The waters surrounding the Outer Hebrides are internationally recognised for their ecological importance, supporting diverse marine life, including seabirds, cetaceans, and migratory species. Construction and long-term operation may disrupt habitats, increase collision risks for birds, and introduce underwater noise affecting marine mammals.

There are also concerns regarding the visual impact on what is widely regarded as one of the UK's most unspoilt coastal landscapes. This may have knock-on effects for tourism, which remains a key part of the local economy. Additionally, local communities often question the extent to which they will directly benefit from such developments, particularly if infrastructure and profits are largely controlled externally.

Furthermore, the cumulative impact of multiple energy projects in the region has not always been fully assessed. A more measured approach, with stronger community engagement, transparent environmental assessments, and clear local economic benefits, would help ensure that renewable energy expansion does not come at disproportionate cost to fragile environments and communities.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: E1E8C8CE

Member of the public 980

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a detailed review of the Environmental Impact Assessment Report and the associated documentation, revealing significant deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns about the scale, proximity, and design of the wind farm raise serious questions regarding its alignment with statutory requirements, national policy, and the essential principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination, with critical environmental data either missing or inadequate. Baseline information provided is inconsistent, and several key elements of the proposal remain undefined. The flexible design framework employed prevents a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures leaves their efficacy unverified. Consequently, the documentation fails to offer a comprehensive understanding of the environmental, cultural, or community impacts, and claims asserting negligible or non-significant effects are not underpinned by credible evidence.

Moreover, there are explicit and substantial conflicts with established policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not satisfactorily demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests necessary for consent and compromise the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal introduces significant concerns, particularly with large turbines positioned alarmingly close to the shoreline. This raises issues regarding landscape capacity, visual dominance, and environmental impact. Collectively, the deficiencies in information, reliance on vague mitigation strategies, evidential shortcomings, and clear policy violations illustrate that the application is incomplete and cannot sustain a lawful determination. In light of these findings, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks essential completeness and transparency, failing to deliver a reliable account of the proposal's likely environmental effects. By employing a flexible Project Design Envelope without committing to specific turbine dimensions, layouts, or configurations, the application introduces considerable uncertainty. This uncertainty obstructs a consistent application of a worst-case scenario, undermining the integrity of the assessment. Consequently, the impacts reported may not accurately reflect the actual development, leaving both the public and the competent authority unable to comprehend the true extent of environmental effects.

Furthermore, the application depends significantly on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be managed later obstructs meaningful evaluation of effectiveness and assessment of residual impacts. This deferral of crucial information to post-consent stages is procedurally unacceptable and stands in stark conflict with the objectives of the Environmental Impact Assessment regime, which stipulates that likely significant effects and mitigation measures must be clearly identified before determination.

Moreover, there are notable evidential shortcomings, such as 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, especially where negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that contravenes statutory requirements.

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

In summary, the 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 deficiencies obstruct a lawful and thorough assessment of environmental effects, thus leaving the competent authority unable to make an informed determination based on the information provided.

FISHERIES AND MARINE LIFE

The evaluation of marine life and fisheries associated with the proposed development is inadequate, failing to adequately address the ecological and socio-economic repercussions. The coastal waters off West Lewis are home to a diverse marine

ecosystem and support a thriving fishing industry. However, the application does not convincingly demonstrate that these vital habitats and activities can be preserved or sustained without significant disruption.

A significant concern is the assumption that displacing fishing operations will not have repercussions. The documentation lacks evidence regarding the availability, accessibility, and capability of alternative fishing grounds to manage increased pressure. This gap is crucial as it raises the risk of overfishing in other areas, potentially leading to broader economic challenges for the local fishing fleet. Without a thorough and evidence-based evaluation, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The high-energy hammer piling anticipated over an extended timeframe is likely to disrupt marine life across extensive distances, impacting species such as dolphins. The predicted disturbance to a large portion of the local bottlenose dolphin population is particularly concerning; however, the application diminishes the importance of these impacts without adequate supporting evidence.

There exists a notable inconsistency in the application, which acknowledges the necessity for licenses to permit harm to European Protected Species while simultaneously characterising these impacts as negligible. This contradiction severely undermines the credibility of the assessment and raises questions regarding adherence to the Habitats Regulations, especially in situations where harm is expected to reach a level that requires legal approval.

Additionally, the assessment does not adequately address the cumulative impacts resulting from various pressures such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough analysis of these combined influences, it is impossible to ascertain the overall effects on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not establish that the development can harmonise with current marine users or evade unacceptable consequences for marine biodiversity, thus obstructing any assertion that the proposal aligns with sustainable development principles.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application under consideration exhibits significant shortcomings in its assessment of onshore infrastructure, which is essential to understanding the overall impact of the integrated project. The separation of offshore turbines and onshore works leads to an incomplete evaluation, obscuring the true extent of environmental and socio-economic repercussions. 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. These activities involve excavation in deep peat areas, notably within Barvas Moor, which serves as a crucial carbon store and ecologically delicate habitat. The absence of a thorough assessment regarding these impacts prevents an accurate understanding of the project's total environmental footprint.

Moreover, the failure to properly assess onshore impacts inhibits a comprehensive evaluation of cumulative effects. The Environmental Impact Assessment process mandates the consideration of all project components in unison; however, the existing separation of onshore and offshore elements results in an insufficient understanding of their collective impacts on peatlands, habitats, and local communities. There are notable risks to sensitive habitats, including machair systems and peatland environments, which are afforded policy protection. The application lacks evidence that impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented, creating a significant evidential void concerning biodiversity protection.

Further concerns arise regarding the carbon balance associated with this proposal. Disturbances to peatland may release stored carbon, thereby potentially incurring a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this matter or demonstrate that the overall carbon balance is advantageous. Additionally, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is no substantiation that the requisite consents or processes have been initiated, which raises serious concerns regarding the deliverability and legality of implementation.

From a policy standpoint, the disjointed assessment of the project and the lack of demonstrated protection for peatlands, habitats, and land use interests conflict with the National Marine Plan and National Planning Framework 4. The inability to show that potential impacts can be avoided or mitigated further diminishes the credibility of the application. Collectively, the fragmented approach to project components, the absence of comprehensive assessment, and the lack of evidential support for environmental and land use impacts render this portion of the application incomplete and unreliable, hindering lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a serious shortcoming in meeting the requirements for sustainable development, as judged against statutory obligations, national policy, and evidential standards. The application mirrors the key issues that led to the rejection of the Lewis Wind Power proposal in

2008, where the level of industrialisation was deemed unacceptable. This time, it is put forward under a more stringent policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

Crucially, the application lacks a complete and reliable evidential basis necessary for determination. There are significant gaps in baseline data, an unspecified design envelope, and mitigation measures that are not clearly defined. Additionally, it omits vital impact pathways, including those relating to nocturnal wildlife, comprehensive onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is inadequate, preventing a full understanding of potential significant effects or residual impacts.

Moreover, there are significant procedural failings. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the failure to provide the full Social Impact Assessment is a material omission. These shortcomings hinder the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal contravenes the National Planning Framework 4 by failing to protect biodiversity, natural areas, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable, nor can it show a net economic benefit owing to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been thoroughly assessed, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially severe. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain instances, inconsistent. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and hindering a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

This will take over the landscape for the whole west wide of the island. The massive impact and damage on such a small community & island has not been considered. This should not go ahead here for multiple reasons.

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: 3771C18C

Member of the public 981

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 regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and its supporting documentation, which reveals significant deficiencies in material planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, relatively untouched environment, and rich cultural identity. Concerns regarding the scale, proximity, and design of the proposal raise questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application presents an inadequate evidential basis for lawful determination. There is a notable absence of critical environmental data, limited and inconsistent baseline information, and significant aspects of the proposal remain undefined. The use of a flexible design framework obscures the understanding of potential significant effects, and reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the documentation fails to provide a comprehensive or informed understanding of environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

Substantial policy conflicts are evident, with the proposal appearing misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly relevant to biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate that it can meet national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts are directly linked to the statutory tests required for consent and compromise the ability of the competent authority to deem the development acceptable from a policy standpoint.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application relies on an undefined Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces significant uncertainty and undermines the integrity of the Environmental Impact Assessment Report, preventing a consistent application of a worst-case scenario. Consequently, the impacts presented may not accurately reflect the development that could ultimately be constructed. This obscures the true extent of environmental effects, preventing both the public and the competent authority from having a clear understanding.

There are considerable evidential deficiencies, including insufficient baseline data, limitations in the methodology, and an overreliance on assumptions rather than site-specific evidence. This lack of robust supporting data results in uncertainty regarding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are made. The absence of adequate information obstructs a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that is incompatible with statutory requirements.

The application seeks consent based on the promise of addressing environmental harm through unspecified mitigation measures, monitoring strategies, and management plans at a later stage. This deferral of essential information to post-consent phases is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's requirement that significant effects and mitigation measures are established before determination.

As a result, the application does not meet the evidential threshold mandated by the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, it fails to 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 appropriate safeguards exist.

In summary, the combination of relying 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 significant deficiencies hinder a lawful and robust assessment of environmental effects, meaning the competent authority cannot adequately determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application does not sufficiently address the assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. It provides a narrative account of the project's evolution rather than a structured comparison of realistic alternatives based on their environmental effects. This method does not adequately demonstrate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

Moreover, there is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. The failure to consider the placement of turbines further offshore, where visual, ecological, and coastal impacts might be reduced, is particularly concerning. The sensitivity of the West Lewis coastline highlights the critical importance of proximity to shore in assessing impacts, and without this analysis, it cannot be concluded that the proposed siting is the least damaging option available.

The inadequacies also extend to the assessments of cable routing and landfall, with insufficient evidence that alternative routes have been properly investigated to minimise impacts on sensitive receptors. This includes culturally and spiritually significant areas, such as Barvas Cemetery. The lack of a clear avoidance strategy coupled with the absence of comparative analysis suggests that the application does not apply mitigation by design but relies instead on post-design measures.

Consequently, the application fails to show that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This constitutes a breach of the established mitigation hierarchy, limiting the competent authority's ability to determine whether less harmful and more appropriate alternatives are available. The absence of a thorough alternatives assessment precludes any conclusion that the proposal is a sustainable or compliant solution with existing policies.

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a significant shortcoming that contributes to the conclusion that the application has not been adequately evaluated, thus preventing a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment pertaining to marine ecology and protected species is fundamentally flawed and fails to deliver a comprehensive understanding of the ecological receptors present in the West Lewis coastal environment. This region is characterised by its sensitivity and biological activity, yet there exists a deficiency in the baseline data, and the methodologies employed inadequately address species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

Significantly, the assessment does not adequately acknowledge or evaluate the presence of otters, which are classified as a European Protected Species. There is a failure to recognise their active utilisation of coastal regions for foraging and movement. This oversight, particularly concerning their core foraging range and behavioural patterns, results in a lack of thorough analysis regarding the potential impacts of construction activities, noise, and increased human presence, thereby undermining any claims of negligible effects on this species.

Moreover, the evaluation of basking sharks is similarly deficient, primarily due to the heavy reliance on aerial surveys that introduce notable detection bias, especially under Atlantic conditions. This methodological choice is likely to lead to an underestimation of the species' presence, especially when compared to established land-based observations that indicate frequent usage of the waters in question. The failure to adequately incorporate or consider such data further compounds the inadequacies in the baseline assessment and diminishes the credibility of the conclusions reached.

These methodological shortcomings result in conclusions regarding negligible or non-significant effects being based on assumptions rather than on solid evidence. Additionally, the lack of adequate baseline data obstructs a meaningful analysis of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation generates uncertainty about the actual scale of risks posed to marine species and habitats.

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

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsubstantiated conclusions culminates in an unreliable assessment. These deficiencies inhibit a rigorous evaluation of impacts on marine ecology and protected species, culminating in the overall assertion that the application is devoid of a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations that are already experiencing decline. The ornithological assessment provided is significantly flawed, containing notable gaps in evidence and internal inconsistencies that compromise its conclusions. The application fails to sufficiently demonstrate, to the required evidential standard, that these species will not be adversely affected. The site is situated within key foraging areas and migratory pathways, yet the assessment does not adequately evaluate the implications of potential displacement, collision risk, or habitat loss.

A glaring contradiction arises within the application itself, as the developer asserts there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the underlying evidence.

The assessment lacks sufficient evidence that seabirds associated with protected

sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully recognised, and the reliance on modelling approaches introduces further uncertainty, particularly concerning species in sharp decline like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is lacking and behavioural responses are not entirely understood.

The placement of turbines within a recognised migratory corridor presents an additional and serious risk, effectively forming a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not appropriately assess the long-term consequences of sustained mortality within this corridor or the possible effects on species with comparatively small global populations.

From a regulatory standpoint, the application fails to fulfil the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and modelling deficiencies, means that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and obstructs a lawful conclusion in favour 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. The inability to prove that internationally important seabird populations will not be adversely impacted places the proposal in direct opposition to national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity within the application is fundamentally flawed and does not recognise the West Lewis coastline as a dynamic cultural landscape. The intrinsic connections between environment, language, tradition, and community are overlooked, leading to a reductionist portrayal of heritage as a collection of isolated, static assets. This approach fails to acknowledge the ongoing social, cultural, and spiritual functions that these elements serve within the community.

The assessment inadequately treats culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial grounds and places of spiritual significance, yet they are mischaracterised as static features devoid of their continued relevance and the potential impacts of development on their surroundings. This lack of understanding leads to an incomplete evaluation of cultural effects and ignores the cemeteries' vital role in community life.

Intangible cultural heritage, including the Gaelic language, local traditions, and the deep-rooted relationship between the community and its coastal environment, is also neglected in the assessment. These aspects are central to the identity of the area, yet their omission signifies a serious gap in understanding the cultural ramifications of the proposed development.

Moreover, there are significant issues regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity akin to that of Indigenous Peoples, yet the process of Free, Prior and Informed Consent has not been implemented. This lack of meaningful engagement raises serious concerns about the legitimacy of the assessment and fails to adhere to established participatory principles regarding decisions that affect cultural and environmental interests.

A critical procedural oversight is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This assessment is essential for the competent authority to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. The absence of this assessment alone renders the determination unlawful.

From a policy standpoint, the application's deficiencies stand in stark contrast to National Planning Framework 4, particularly regarding the protection of historic assets and sites. The neglect of both tangible and intangible heritage, along with the disregard for living cultural practices, signifies a blatant departure from policy requirements.

In summary, the combined failures to assess living heritage, intangible cultural value, community rights, and adherence to statutory obligations culminate in a significant evidential gap. The cultural impacts of the proposed development remain inadequately assessed, and the application does not provide a reliable foundation for understanding the true cultural costs associated with it.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing associated with the proposal is fundamentally flawed due to a lack of transparency, which is essential for a legally sound assessment. Although the developer engaged in a Social Impact Assessment that included focus groups with local residents, the comprehensive report has not been made available. This creates a substantial evidential gap, hindering both public understanding and the ability of the competent authority to grasp the full spectrum of social risks revealed through the developer's research.

Summaries that are accessible indicate that local residents are already undergoing significant levels of stress, anxiety, and concern attributable to the scale and proximity of the proposed development. These effects arise from direct interactions and are not conjectural. Nonetheless, the absence of the complete assessment prevents thorough examination of these findings, limiting the opportunity to appraise their implications within the broader decision-making framework.

Moreover, there is indication that the proposal is viewed as a direct threat to community identity and cohesion, with the potential for "cultural loss" highlighted in the findings of the developer. Despite this recognition, these social impacts have not been fully acknowledged in the main application nor afforded the necessary weight. Consequently, withholding the complete Social Impact Assessment obscures the genuine human and social costs of the development.

This lack of transparency further undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health ramifications is crucial for developments of this magnitude, especially when they may influence community character and functionality. The failure to provide the complete dataset results in an incomplete evidential foundation for evaluating the balance between benefits and potential harms.

From a policy standpoint, the application does not adequately demonstrate adherence to the National Planning Framework 4 concerning health and wellbeing. It is necessary for development to foster positive health outcomes while mitigating adverse effects; however, the evidence available suggests that there are already negative impacts that have not been fully disclosed. Without access to the entire assessment, it cannot be confirmed that the application aligns with this policy.

The implications of these procedural deficiencies are significant. The competent authority is unable to conduct a thorough socio-economic and health assessment without the full Social Impact Assessment, marking a material omission in the application and a failure to satisfy the evidential requirements established by the Environmental Impact Assessment framework.

Ultimately, the failure to disclose the complete Social Impact Assessment, coupled with documented existing adverse effects, renders the evaluation incomplete and unreliable. This situation obstructs a lawful determination, reinforcing the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The application presents a materially deficient assessment of construction and pollution risks, failing to provide the necessary detail to evaluate likely environmental effects. Despite the proposal involving significant seabed preparation and installation works in a high-energy Atlantic environment, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be developed post-consent, thereby hindering a meaningful assessment of their adequacy or effectiveness.

Particularly alarming is this reliance on undefined future measures, especially in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks sufficient detail regarding the prevention, control, or monitoring of these risks.

There is considerable uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also pertains to potential effects on marine species and habitats already recognised as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application undermines the evaluation of whether suitable safeguards are established to address pollution events. This introduces procedural risk and compromises the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures are evaluated prior to consent, and the absence of such information renders a lawful determination unattainable. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the deficiencies related to the undefined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively indicate that the assessment is materially deficient. These inadequacies obstruct a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application lacks a thorough evaluation of ecological and socio-economic impacts, raising significant concerns about the potential disruption to these vital resources. A critical issue lies in the assumption that fishing activity can be displaced without consequence, yet there is no evidence provided that alternative fishing grounds are available or capable of supporting the additional pressure this displacement would create. This omission is alarming, as it risks overfishing in other areas and could have broader economic ramifications for the local fishing fleet. Without a detailed assessment grounded in evidence, the implications for fisheries and local livelihoods remain obscure.

Additionally, the proposal poses considerable risks to marine species, notably due to underwater noise generated during construction. The high-energy hammer piling expected to occur over an extended period is likely to cause disturbances across vast distances, potentially affecting species such as dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population raises profound concerns; yet, the application tends to diminish the importance of these effects without adequate supporting evidence.

There exists a troubling inconsistency within the application. While it acknowledges the necessity of licences to permit harm to European Protected Species, it simultaneously characterises the impacts as negligible. This contradiction undermines the credibility of the assessment and prompts concerns regarding adherence to the Habitats Regulations, especially where anticipated harm would necessitate legal authorisation.

Furthermore, the assessment fails to account for cumulative impacts that arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without an in-depth evaluation 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 alignment with the National Planning Framework 4 or the National Marine Plan. It does not sufficiently show that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, obstructing any conclusion that the proposal embodies sustainable development.

In summary, the inadequacy of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions within the application render the assessment incomplete and unreliable. These shortcomings hinder any robust evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is incomplete, failing to capture the full extent of impacts associated with this integrated project. The offshore turbines and onshore works are interconnected, yet the current evaluation treats them separately. This fragmented approach obscures the true scale of environmental and socio-economic effects.

The onshore components consist of cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure through sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. However, the application lacks a comprehensive assessment of these impacts, leading to an inadequate understanding of the project's overall environmental footprint.

Moreover, by omitting or postponing the evaluation of onshore impacts, the application hinders a proper appraisal of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively, yet the division between offshore and onshore elements leaves the combined impacts on peatlands, habitats, and communities insufficiently understood.

There are notable risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not convincingly demonstrate that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, creating an evident gap in biodiversity protection.

Concerns also arise regarding carbon balance, as disturbing peatland can release stored carbon, potentially resulting in a carbon debt that contradicts the goals of renewable energy development. The application inadequately addresses this issue and fails to show that the overall carbon balance remains positive.

Additionally, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not provide sufficient evidence that the required consents or processes have been initiated, which casts doubt on the deliverability and lawful execution of the proposal.

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

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, impeding a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks an assessment of dark skies and nocturnal wildlife, which constitutes a significant omission. The coastline of West Lewis is characterised by its exceptionally dark skies, integral to the area's environmental quality, cultural identity, and tourism appeal. The proposed introduction of permanent red aviation lighting, which would be visible over extensive distances, is anticipated to create a continuous and intrusive "wall of light" across the western horizon, fundamentally altering the night-time environment.

There is no consideration of how this lighting may impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly significant given the critical role of dark skies in the local identity and the growing sectors of astro-tourism. The failure to evaluate these impacts highlights a considerable gap in the overall assessment of the landscape and environment.

Equally concerning is the absence of an evaluation concerning nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit a high sensitivity to artificial lighting due to phototaxis, which can result in disorientation and an increased risk of collision. The application lacks any lighting impact assessment or phototaxis study, failing to address how the proposed aviation lighting could affect these species or contribute to increased mortality rates.

This shortfall is exacerbated by the reliance on daytime survey data within the ornithological assessment, which does not adequately capture nocturnal activity or associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has not been evaluated. The failure to provide site-specific night-time data creates a crucial gap in the understanding of ecological impacts.

Without a thorough assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites might face adverse effects. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt remains unfulfilled, necessitating the application of the precautionary principle and precluding a lawful determination.

From a policy standpoint, these omissions contravene the National Planning Framework 4 in terms of protecting natural environments and ensuring environmental quality. Furthermore, this lack of assessment undermines the comprehensive evaluation of landscape and seascape impacts, given that the character of the night-time environment is a vital aspect of the overall ecosystem.

In summary, the failure to assess dark skies and nocturnal wildlife creates a substantial evidential gap. The application is incomplete, lacking essential baseline data, impact modelling, and species-specific analyses, rendering it inadequate for supporting a lawful determination.

TOURISM

The evaluation of tourism impacts within the application is severely lacking and does not adequately assess the economic and social repercussions for a critical sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and the sense of remoteness they provide. While the application notes that 86% of visitors are attracted by the scenery, it fails to deliver a quantified analysis of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution of tourism.

The tourism sector has experienced considerable growth, with revenue rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and comprising up to 16% of the island's economy. Nonetheless, the proposal does not consider how the industrialisation of the seascape and degradation of environmental quality may affect Tourism Gross Value Added or the broader economic resilience of the area.

Without such modelling, it is impossible to ascertain whether the development would provide a net economic benefit or adversely impact a well-established and expanding sector.

Furthermore, the assessment neglects to examine the significance of environmental quality for tourism, particularly regarding the value of unspoiled landscapes and dark skies to the visitor experience. This is especially relevant for growing sectors such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, resulting in a considerable shortfall in understanding the implications for an acknowledged and emerging facet of the local economy.

Considering that the island community possesses limited economic diversity, the oversight in assessing tourism impacts carries broader consequences for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been properly evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly regarding economic impact and the necessity to illustrate net benefit. It also contradicts strategic objectives that highlight tourism as a priority growth sector and fails to present sufficient evidence for the competent authority to analyse the economic ramifications of the proposal.

In summary, the collective shortcomings in quantifying tourism impacts, evaluating environmental factors influencing visitor behaviour, and acknowledging the island's economic dependency create a significant evidential gap. This inhibits a comprehensive assessment of economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant shortfall in meeting the criteria for sustainable development as mandated by statutory responsibilities, national policy, and evidential standards. It echoes the key issues that resulted in the denial of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This current application, however, is being considered under a more robust policy framework that emphasises the importance of biodiversity, peatland preservation, landscape integrity, and community wellbeing.

There is a lack of a comprehensive and reliable evidential foundation for this application. Notably, there are substantial deficiencies in baseline data, the continued use of an undefined design envelope, reliance on unspecified mitigation measures, and critical omissions regarding impact pathways, which include nocturnal wildlife, complete onshore infrastructure, and effects on tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of likely significant effects or residual impacts.

Procedural inadequacies are evident as well. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory duty under the Islands (Scotland) Act 2018, while the failure to present the complete Social Impact Assessment represents a significant omission. These shortcomings inhibit the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Furthermore, the proposal is at odds with National Planning Framework 4. It does not adequately demonstrate protection for biodiversity, natural landscapes, and cultural heritage. There is insufficient evidence to support that health and wellbeing impacts are acceptable, nor is there demonstrable net economic benefit due to the lack 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 associated with the proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also internally inconsistent in certain aspects. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, which invokes the precautionary principle and precludes a lawful conclusion regarding the acceptability of impacts.

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

In summary, this application is procedurally and substantively unfit for determination. The plethora of information deficiencies, in conjunction with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority is compelled to either refuse consent on these grounds or invoke the appropriate regulatory provisions to necessitate the submission of 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.

Additional Comments

I lived in Bru for a number of years and was attracted to the area initially by the sheer beauty of the views across Loch Barvas and out to sea.

The unspoilt beauty of the Westside, a huge draw for tourists who are the life blood for the island's economy, would be ruined by both the turbines and the huge factory in Upper Barvas.

The processing of electricity should take place off shore as it is in Moray East. If Whitehills and Sandend don't have huge cables coming ashore at the landing sites then why should residents on Lewis be treated any differently?

In a nutshell:
N4 conflicts with the Development Plan and NPF4
- N4 harms protected seabirds
- N4 harms vulnerable and protected marine life
- N4 harms humans living in close proximity
- N4 conflicts with the landscape and character of the West Side of Lewis
- N4 harms visual amenity by introducing an industrial scale that clashes with the horizon
- N4 conflicts with and threatens tourism
- N4 harms dark skies
- N4 conflicts with transport capacity
- N4 harms heritage and other historic sites
- N4 causes cumulative harm that is long-term and difficult to reverse
- N4 conflicts with biodiversity policy
- N4 threatens community identity, tradition, and the distinct character of the West Side

I now live in Stornoway and nobody I've spoken to here is in favour of this development.

Thank you for reading this

[Redacted]

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: 66543B55

Member of the public 982

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 basis for this objection stems from a review of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant planning, environmental, cultural, and procedural deficiencies.

The location of the proposed development off the west side of the Isle of Lewis is notable for its Atlantic-facing coastline and near-pristine environment, as well as its strong cultural identity. Concerns arise from the scale, proximity, and design of the proposal, which raises questions about its alignment with statutory requirements, national policy, and sustainable development principles.

A critical issue with the application is the lack of adequate evidential support for a lawful determination. Missing environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal hinder a clear understanding of the likely significant effects. The flexible design framework employed does not provide clarity, and the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to enable a comprehensive understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

Moreover, there are substantial conflicts with policy. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests required for consent, undermining the competent authority's ability to assess the development as acceptable in policy terms.

The unprecedented scale of the proposal, with large turbines situated near the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. Taken together, the lack of sufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and unable to support a lawful determination. In light of these issues, the precautionary principle must be invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species is fundamentally inadequate, failing to deliver a thorough and dependable understanding of the ecological receptors in the West Lewis coastal environment. This area is characterised as a highly sensitive and biologically active marine system. However, the baseline data remains incomplete, and the methodologies employed do not sufficiently capture the presence, behaviour, and habitat usage of species. Consequently, the assessment lacks a robust evidential basis for impact evaluation.

A significant oversight in this application is the inadequate recognition and assessment of otters, which are classified as a European Protected Species. The failure to appropriately consider their active usage of coastal zones for foraging and movement is critical. This omission extends to an insufficient analysis of their core foraging range and behavioural patterns, leading to a lack of thorough assessment regarding the potential impacts of construction disturbance, noise, and increased activity. This deficiency undermines any claims regarding the absence of significant effects on this species.

Further inadequacies are evident in the assessment of basking sharks, particularly due to the reliance on aerial surveys, which introduce notable detection bias, especially under Atlantic conditions. Such an approach is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent usage of these waters. The failure to properly incorporate or consider this pertinent data results in an incomplete baseline, further weakening the reliability of the conclusions drawn.

These methodological shortcomings mean that the assertions of negligible or non-significant effects rely more on assumptions than on solid evidence. The lack of adequate baseline data also hampers the ability to conduct a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty about the actual scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the stipulations of the Environmental Impact Assessment regime or the National Planning Framework 4, as there has been no proper identification or assessment of protected species. The uncertainty that arises from these deficiencies inhibits the ability to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In this context, the granting of consent cannot be justified legally.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application proposes the development of turbines situated within a key migratory corridor on the west coast of the Isle of Lewis, an area that is home to internationally significant seabird populations, many of which are already experiencing decline. However, the ornithological assessment associated with this application is fundamentally flawed, containing significant gaps in evidence and internal inconsistencies that compromise its conclusions. The assessment fails to adequately demonstrate that these seabird species will not be adversely affected, particularly regarding important foraging areas and migratory pathways. It does not sufficiently evaluate the risks associated with displacement, collision, or habitat loss.

A notable contradiction arises within the application, as the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment, suggesting that the conclusions drawn are not supported by the underlying evidence. Additionally, the assessment lacks adequate evidence to confirm that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The crucial significance of these feeding grounds is not fully acknowledged, and the reliance on modelling methods creates uncertainty, particularly for species facing severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially given the incomplete baseline data and insufficient understanding of behavioural responses.

Moreover, the positioning of turbines within a recognised migratory corridor introduces an additional and substantial risk, effectively acting as a barrier within a primary flight path for species migrating between the United Kingdom and Iceland. The application fails to thoroughly assess the long-term implications of ongoing mortality within this corridor or the potential impact on species with relatively small global populations.

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

The identified deficiencies further reflect non-compliance with National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Overall, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These shortcomings inhibit a thorough evaluation of potential impacts and contribute to the conclusion that the application fails to meet the statutory requirements necessary for a favourable determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is significantly deficient, failing to acknowledge the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are fundamentally intertwined. The application adopts an overly simplistic approach, viewing heritage as a collection of separate, unchanging assets, rather than recognising their continuous social, cultural, and spiritual roles within the community.

A major shortcoming is the handling of culturally important sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial sites and centres for spiritual practice, yet they are characterised as static elements in the assessment. This oversight neglects their ongoing significance, use, and the implications of development on their surroundings. Such a misrepresentation leads to an incomplete understanding of cultural impacts, disregarding their integral role in community life.

Additionally, the assessment overlooks the intangible aspects of cultural heritage, which encompass the Gaelic language, traditions, and the enduring relationship between the local community and the coastal environment. These components are vital to the area's identity, yet they are completely excluded from consideration, marking a considerable gap. Without addressing these elements, the true cultural impact of the proposed development remains unclear.

There are also serious concerns regarding community engagement and rights. The Gaelic-speaking population maintains a unique cultural identity recognised as characteristic 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 adhere to established principles regarding participation in matters that affect cultural and environmental interests.

Moreover, a crucial procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly concerning the preservation of historic assets and spaces. The failure to take into account both tangible and intangible heritage, as well as to acknowledge living cultural practices, constitutes a clear violation of policy requirements.

In summary, the neglect to assess living heritage, intangible cultural values, community rights, and statutory obligations creates a substantial evidential void. The cultural ramifications of the proposed development have not been adequately examined, and the application fails to offer a solid foundation for determining the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal currently under consideration has a materially deficient assessment of social impacts, health, and wellbeing, lacking the transparency required for a lawful evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, yet the full report remains unpublished. This creates a significant evidential gap that impedes both public understanding and the competent authority's ability to grasp the full extent of social risks identified in the developer's own research.

Available summaries reveal that local residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the development. These impacts are based on direct engagement and are not speculative. However, the failure to disclose the complete assessment restricts proper scrutiny of these findings, thereby limiting the capacity to assess their significance in the decision-making process.

There is also 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. Despite this, such impacts have not been adequately integrated into the main application nor given due consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health impacts is crucial for developments of this scale, especially where community character and functioning may be compromised. The application fails to provide a complete evidential basis for evaluating the balance between benefits and harms 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 are required to support positive health outcomes and avoid harm, yet the evidence at hand points to existing adverse effects that have not been fully disclosed. Without access to the complete assessment, compliance with this policy cannot be verified.

The procedural implications are significant, as the competent authority is unable to conduct a rigorous socio-economic and health evaluation without the complete Social Impact Assessment. This constitutes a material omission within the application and a failure to meet the evidential requirements set forth by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of current adverse impacts, renders the assessment incomplete and unreliable. This prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information for support.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application presents significant deficiencies in its assessment of seascape, landscape, and visual impacts, failing to adequately capture both the scale of change and the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a profound sense of remoteness. The proposed large-scale turbines, sited in close proximity to the shore, would result in an overwhelming industrial presence that fundamentally transforms this landscape, leading to permanent and irreversible changes.

Furthermore, the application does not accurately depict the extent of the visual impact resulting from the turbines. Their size and closeness would overshadow views from residential areas, historic sites, and popular coastal locations, thereby diminishing visual amenity and undermining the qualities of naturalness and remoteness that define this area. The assessment lacks an appropriate representation of this level of impact, especially considering the sensitivity of the landscape.

Concerns also arise regarding the methodology employed in selecting and presenting visual viewpoints. It appears that these viewpoints may not adequately reflect the most sensitive receptors or potential worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This inadequacy raises the possibility that the visual impact has been underestimated, which calls into question the reliability of the assessment.

Another notable gap in the assessment is the neglect of the interconnected relationships between landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape that is visually and spatially linked to the Atlantic horizon. However, the evaluation treats these heritage assets as separate entities, failing to acknowledge their interdependence and resulting in an incomplete understanding of the impacts on their setting and cultural significance.

The anticipated industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This represents not just a visual impact but a more extensive cultural and spatial detriment that the application has not sufficiently examined.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, which aims to protect natural environments and historic assets. The scale of transformation is at odds with the obligation to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case scenario assessment further detracts from any assertions of policy adherence.

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 overwhelmingly dominant and unavoidable. Consequently, the changes brought about by this proposal

are not amenable to reduction through mitigation measures, leading to fundamental and permanent alterations in the landscape.

In summary, the assessment does not accurately portray the extent of impact, the environmental sensitivity, or the interconnectedness of landscape and heritage. These shortcomings prevent a reliable evaluation and solidify the conclusion that the proposal is incompatible with the protection of this important landscape.

CONSTRUCTION AND POLLUTION RISKS

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

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

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

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

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

FISHERIES AND MARINE LIFE

The application lacks a comprehensive assessment of fisheries and marine life, failing to provide a solid evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are known to host a diverse marine ecosystem alongside an active fishing industry, yet the proposal does not convincingly show how these habitats and uses can be preserved without significant disruption.

One major concern lies in the assumption that fishing activities can be relocated without repercussions. There is no evidence presented to suggest that alternative fishing grounds exist, are accessible, or can sustain increased pressure. This gap in information is crucial, as the potential for overfishing in other areas due to displacement poses risks to the local fishing fleet's economic viability. An absence of a clear, evidence-based assessment means that the consequences for both fisheries and the livelihoods dependent on them remain unclear.

Additionally, the proposal poses substantial risks 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 expected to cause significant disturbances across wide areas, potentially affecting species like dolphins. The predicted impact on a large portion of the local bottlenose dolphin population raises serious issues, yet the application minimizes these concerns without adequate supporting evidence.

There is also a notable inconsistency in the application regarding the acknowledgement of the need for licenses to permit harm to European Protected Species, while simultaneously characterizing impacts as negligible. This contradiction undermines the assessment's credibility and raises serious questions about adherence to the Habitats Regulations, especially where expected harm necessitates legal authorisation.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of evaluation regarding nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. No assessment has been made concerning the impacts of artificial lighting on species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, all of which are highly sensitive to light. These species can experience disorientation due to phototaxis, leading to an increased risk of collision. The application does not provide a lighting impact assessment or a phototaxis study, which means it fails to consider how the proposed aviation lighting could affect these species or potentially increase mortality rates.

Moreover, the assessment relies on daytime survey data, neglecting nocturnal activity and the associated risks. Species like Kittiwakes, which may forage or migrate at night, are similarly vulnerable to the effects of artificial lighting. This oversight creates a critical gap in understanding the ecological impacts that the proposal may have on local wildlife.

The introduction of permanent red aviation lighting is another significant concern. This lighting would be visible over long distances, creating an intrusive "wall of light" across the western horizon, which would fundamentally alter the night-time environment. The assessment does not address how this would impact visual amenity, landscape character, or the experience of residents and visitors, despite the importance of dark skies to the area's identity and its emerging tourism sectors, such as astro-tourism.

From a policy standpoint, these omissions conflict with National Planning Framework 4, which relates to the protection of natural places and environmental quality. The absence of an assessment of dark skies undermines the broader evaluation of landscape and seascape impacts, as the night-time character is an integral part of the environment.

Overall, the failure to assess the impacts on dark skies and nocturnal wildlife constitutes a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis leaves the application incomplete and unable to support a lawful determination. Without a thorough assessment, it is impossible to ascertain whether protected species or designated sites would be adversely affected, which engages the precautionary principle and necessitates a more cautious approach.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development, particularly when evaluated against statutory duties, national policy, and evidential standards. This application mirrors the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, wherein the unacceptable scale of industrialisation was a decisive factor. Despite being submitted under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application lacks a complete and reliable evidential foundation necessary for informed determination.

There are significant deficiencies in the baseline data provided, and the continued use of an undefined design envelope raises concerns. The reliance on unspecified mitigation measures and the failure to address key impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, render the Environmental Impact Assessment inadequate. This lack of completeness prevents a thorough understanding of likely significant effects or any residual impacts.

The procedural failures are evident, particularly the absence of a compliant Island Communities Impact Assessment, which breaches statutory duties under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose a complete Social Impact Assessment constitutes a material omission, obstructing the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings are sufficient to deem the application unfit for determination.

In direct violation of National Planning Framework 4, the proposal fails 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 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 proposal remain uncertain and potentially significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which engages the precautionarvy principle and precludes a lawful conclusion regarding the acceptability of impacts.

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 6AD1998B

Member of the public 983

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and the accompanying documentation has revealed significant deficiencies across various domains including 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, nearly pristine environment, and rich cultural identity. The design, scale, and proximity of the wind farm raise serious concerns about its alignment with statutory requirements, national policy, and the principles of sustainable development.

One of the key issues is that the application does not present an adequate evidential basis necessary for a lawful determination. It is evident that critical environmental data is absent, and the baseline information provided is both limited and inconsistent. Furthermore, essential elements of the proposal remain undefined, which hinders the ability to assess potential impacts accurately. The reliance on a flexible design framework obscures an understanding of likely significant effects, while the unspecified mitigation measures leave their effectiveness uncertain. Consequently, the existing documentation fails to deliver a comprehensive understanding of the environmental, cultural, or community implications, and assertions of negligible or non-significant effects lack robust supporting evidence.

Moreover, the proposal conflicts with several policies, showcasing inconsistencies with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly evident with respect to biodiversity, natural habitats, cultural heritage, and public health and wellbeing. The application has not adequately demonstrated compliance with national obligations aimed at protecting biodiversity, climate interests, and environmental integrity. These policy conflicts are central to the statutory tests required for consent and fundamentally undermine the competent authority's ability to deem the development acceptable from a policy perspective.

The unprecedented scale of the proposal introduces substantial concerns related to landscape capacity, visual dominance, and environmental impact, especially given the positioning of large turbines in close proximity to the shoreline. When considering the lack of adequate information, reliance on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance, it is clear that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The proposal is supported by an Environmental Impact Assessment Report that is materially deficient and does not present a comprehensive, transparent, or dependable account of the likely environmental effects. The reliance on a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, introduces significant uncertainty. This approach obstructs a consistent application of a worst-case scenario, undermining the integrity of the assessment and preventing both the public and the competent authority from grasping the true extent of environmental effects.

Additionally, the application depends heavily on undefined mitigation measures, monitoring strategies, and management plans. This means that consent is being sought on the basis that any potential environmental harm will be addressed at a later stage, hindering a meaningful evaluation of effectiveness or assessment of residual impacts. The deferral of crucial information to post-consent stages is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation strategies be clearly established prior to determination.

The report also suffers from significant evidential deficiencies, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially where negligible or non-significant effects are asserted without robust supporting data. The lack of adequate information prevents a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly in relation to protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies preclude a lawful and robust assessment of environmental effects, meaning that the competent authority is not adequately positioned to determine the application based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents significant deficiencies in the assessment of marine ecology and protected species, failing to deliver a complete and reliable understanding of the

ecological receptors within the West Lewis coastal environment. This area is recognised as a highly sensitive and biologically active marine system, yet the provided baseline data remains incomplete. Moreover, the methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of various species. Consequently, the assessment lacks a sound evidential basis for evaluating potential impacts.

A critical gap exists regarding otters, which are classified as a European Protected Species. The application does not adequately acknowledge or evaluate their active use of coastal regions for foraging and movement. The omission of their core foraging range and behavioural patterns leads to an insufficient assessment of how construction disturbances, noise, and increased activity might affect them. This oversight undermines the conclusions drawn about the absence of significant effects on this species.

The evaluation of basking sharks also reveals shortcomings, as it relies on aerial surveys that introduce a substantial detection bias, particularly under Atlantic conditions. This method is likely to result in an underestimation of their presence, especially when compared to established land-based observations that suggest these waters are frequently used by the species. Neglecting to incorporate or adequately consider such data contributes to an incomplete baseline, ultimately weakening the reliability of the conclusions made.

These methodological flaws imply that conclusions regarding negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of sufficient baseline data further hampers the ability to conduct a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This raises uncertainty about the true extent of risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements outlined by the Environmental Impact Assessment regime and National Planning Framework 4, as there has been an inadequate identification or assessment of protected species. This uncertainty prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Given these circumstances, granting consent would not be lawful.

In summary, the combined issues of incomplete baseline data, flawed methodologies, and unsupported conclusions lead to an assessment that is fundamentally unreliable. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment provided in the application is flawed, presenting significant gaps in evidence and internal contradictions that seriously undermine its conclusions. Key

foraging areas and migratory pathways for seabird populations are located on the west coast of the Isle of Lewis, which is home to internationally important species that are already in decline. However, the application fails to adequately demonstrate, to the necessary evidential standard, that these species will not face adverse effects due to the proposed development. Critical issues such as displacement, collision risk, and habitat loss are not thoroughly evaluated within the assessment.

A notable inconsistency arises in the application, as the developer asserts that there will be no significant adverse effects while concurrently putting forth a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This contradiction raises concerns about the assessment's reliability and suggests that the conclusions drawn are not substantiated by the available evidence.

Moreover, the assessment does not sufficiently establish that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these vital feeding grounds has not been fully considered, and the dependence on modelling approaches brings added uncertainty, particularly for species experiencing severe decline like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, particularly in light of incomplete baseline data and insufficient understanding of behavioural responses.

The proposed turbine locations are situated within a recognised migratory corridor, which introduces a significant risk by creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to assess the long-term implications of sustained mortality within this corridor, as well as the potential impact on species with relatively small global populations.

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

Furthermore, the identified deficiencies represent a failure to comply 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 suffer adverse effects places the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity related to the proposed development is seriously flawed. It does not recognise the West Lewis coastline as a dynamic cultural landscape that intertwines environment, language, tradition, and community. Instead, the application reduces heritage to isolated, static assets, ignoring their ongoing social, cultural, and spiritual roles within the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are treated as unchanging features in the assessment, despite being active places of burial and spiritual practice. This oversight fails to acknowledge their continued use and significance, leading to an incomplete evaluation of cultural effects and neglecting their importance in community life.

Moreover, the application does not address intangible cultural heritage, which includes the Gaelic language and traditions as well as the long-standing connection between the community and the coastal environment. These critical elements are absent from the assessment and represent a significant oversight, preventing a full understanding of the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity that aligns with the characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent, which undermines the legitimacy of the assessment and fails to adhere to principles of participation in decisions affecting cultural and environmental interests.

A key procedural failure is the lack of a compliant Island Communities Impact Assessment, required under the Islands (Scotland) Act 2018. The absence of this assessment means 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.

From a policy standpoint, these deficiencies contradict the National Planning Framework 4, especially regarding the protection of historic assets and places. The neglect of both tangible and intangible heritage, as well as living cultural practices, clearly diverges from policy requirements.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of health, wellbeing, and social impacts related to the proposal is significantly lacking, with transparency essential for a lawful evaluation being absent. Although the developer commissioned a Social Impact Assessment that included focus groups involving local residents, the full report remains unpublished. This creates a critical evidential gap, limiting both public understanding and the competent authority's

capacity to grasp the full extent of social risks identified by the developer's own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts stem from direct engagement and are therefore grounded in reality, not speculation. However, the failure to disclose the complete assessment restricts adequate scrutiny of these findings, thereby hampering the ability to assess their significance during the decision-making process.

Moreover, there is indication that the proposal threatens community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, such impacts have not been properly integrated into the main application or afforded the necessary importance. The withholding of the entire Social Impact Assessment obscures the genuine human and social costs of the development.

This lack of transparency adversely affects the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly where community character and functioning are at stake. By not providing the complete dataset, the application fails to establish a full evidential basis for weighing the balance of benefits against harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. It is imperative that developments promote positive health outcomes and avert harm. Nonetheless, the evidence available points to existing adverse effects that remain inadequately disclosed. Without the full assessment, it is impossible to confirm adherence to this policy.

The procedural implications of this situation are profound. The competent authority is unable to perform a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a critical omission within the application and a failure to meet the evidential standards set by the Environmental Impact Assessment framework.

In conclusion, the failure to disclose the complete Social Impact Assessment, coupled with evidence of existing negative impacts, renders the evaluation incomplete and unreliable. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is fundamentally inadequate and does not reflect the true scale of change or the sensitivity of the receiving environment. The coastline of West Lewis, characterised by its open Atlantic horizon and undeveloped nature, exudes a strong sense of remoteness. The placement of large-scale turbines near the shoreline would lead to a continuous industrial

presence, fundamentally altering this character and resulting in a permanent transformation of the landscape that is irreversible.

Moreover, the application does not represent the extent of the visual change accurately. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would directly affect visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment fails to properly convey the level of impact or its importance in the context of such a sensitive landscape.

Concerns also arise regarding the selection and representation of visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and valuable landscapes. This casts doubt on the assessment's reliability, suggesting that the visual impact may have been understated.

Additionally, the assessment neglects the interconnected relationship between landscape, seascape, and cultural heritage. Iconic sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. These sites are treated as isolated elements, failing to recognise their interdependence, which leads to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the protection of natural places and historic assets. The extent of change is incompatible with the obligation to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertions of policy adherence.

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

Collectively, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is not compatible with the protection of this landscape.

FISHERIES AND MARINE LIFE

The application proposes a development that presents substantial risks to marine species and the local fishing industry. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing sector. However, the assessment of fisheries and marine life is insufficient, lacking a robust evaluation of both ecological and socio-economic impacts. Notably, the application does not adequately demonstrate how these habitats and activities can be protected or maintained without significant disruption.

A significant concern arises from the assumption that fishing activities can be displaced without any consequences. The application fails to provide evidence that alternative fishing grounds are available, accessible, or capable of supporting increased pressure from displaced activities. This oversight is critical, as it poses a risk of overfishing in other areas and could lead to wider economic repercussions for the local fishing fleet. In the absence of a clear and evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Moreover, the proposed development introduces considerable risks to marine species, particularly through the underwater noise produced during construction activities. The use of high-energy hammer piling over an extended period is likely to disturb marine life across extensive areas, with potential effects on species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns. However, the application tends to downplay the significance of these impacts, lacking sufficient supporting evidence.

There is an evident inconsistency within the application, acknowledging the need for licenses to permit harm to European Protected Species while simultaneously describing these impacts as negligible. This contradiction calls into question the credibility of the assessment and raises concerns regarding compliance with the Habitats Regulations, particularly where anticipated harm may require legal authorisation.

Additionally, the assessment does not account for cumulative impacts that arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, determining the overall impact on marine ecosystems and socio-economic conditions remains unattainable.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, ultimately precluding any conclusion that the proposal aligns with sustainable development principles.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances, leading to a continuous and intrusive “wall of light” effect across the western horizon. This change fundamentally alters the night-time environment along the West Lewis coastline, which is known for its exceptionally dark skies. These dark skies are vital to the area’s environmental quality, cultural identity, and tourism value.

The Environmental Impact Assessment notably lacks an evaluation of how this lighting will impact visual amenity, landscape character, and the experience of residents and visitors. Given the significance of dark skies to the local identity and the emerging sector of astro-tourism, this omission represents a substantial gap in the overall landscape and environmental assessment.

Furthermore, there is no analysis of the impacts on nocturnal wildlife, including species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, which are highly sensitive to artificial lighting. The absence of any lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species, including disorientation and increased collision risk, have not been addressed.

The ornithological assessment relies solely on daytime survey data, which fails to capture nocturnal activity and associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

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

From a policy standpoint, the absence of these assessments conflicts with the National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, it undermines the overall assessment of landscape and seascape impacts, as the night-time character is an integral aspect of the environment.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is a significant misalignment with the principles of sustainable development as required by statutory obligations, national policy, and evidential standards. This application mirrors the key issues that

led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being put forward under an enhanced policy framework that prioritises biodiversity, peatland conservation, landscape preservation, and the wellbeing of communities, the application falls short in critical areas.

A reliable and complete evidential basis for decision-making is lacking. There are notable gaps in baseline data, and the continued reliance on an undefined design envelope poses additional concerns. Furthermore, it depends on unspecified mitigation measures and fails to consider important impact pathways, including those affecting nocturnal wildlife, the full extent of onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is inadequate, preventing a thorough understanding of likely significant effects and residual impacts.

In addition to these substantive issues, procedural shortcomings are evident. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Moreover, the lack of a comprehensive Social Impact Assessment represents a material omission that hinders a proper evaluation of impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies are significant enough to deem the application unsuitable for determination.

The proposal also stands in opposition to National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. The proposal fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, notably due to the absence of tourism impact modelling. Additionally, the cumulative effects of both offshore and onshore components have not been sufficiently assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially serious. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, activating the precautionary principle and making it impossible to lawfully conclude that the impacts are acceptable.

Moreover, the proposal threatens to create substantial and irreversible alterations to a notably sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual connections, and the negative impact on tourism represent permanent changes that cannot be adequately mitigated.

Overall, the application is both procedurally and substantively unfit for determination. The extent of information deficiencies, alongside policy conflicts and unresolved environmental risks, precludes a lawful, evidence-based decision. The competent authority must either refuse consent on these grounds or invoke the relevant regulatory

provisions to compel the submission of the necessary missing information.

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

Additional Comments

I have no idea how this project has even got this far. Its to close, to big and in the wrong place. Our islands and our coastal environments should be protected to a point that projects like this should never happen.

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: 98EE52C1

Member of the public 984

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 in accordance with the marine licensing and Environmental Impact Assessment processes. The objection is grounded in a thorough evaluation of the Environmental Impact Assessment Report and accompanying documentation, which reveal significant planning, environmental, cultural, and procedural deficiencies. The proposed development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, largely unspoiled environment, and strong cultural heritage. The dimensions, proximity, and overall design of the project raise essential concerns about its alignment with statutory obligations, national policies, and the principles of sustainable development.

The application lacks a sufficient evidential foundation for a lawful assessment. There is a notable absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Furthermore, key elements of the proposal are not clearly defined. The flexible design framework employed inhibits a comprehensive understanding of the potential significant effects, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the documentation fails to facilitate a complete or informed assessment of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are unsubstantiated by robust evidence.

Substantive conflicts with existing policy are evident. 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 environments, cultural heritage, and public health and wellbeing. It does not demonstrate compliance with national requirements to safeguard biodiversity, climate considerations, and environmental integrity. These inconsistencies directly affect the statutory tests necessary for consent and compromise the competent authority's ability to deem the development acceptable from a policy perspective.

The scale of the project is without precedent in this region, with large turbines proposed in very close proximity to the shoreline. This raises significant concerns regarding the capacity of the landscape, visual dominance, and environmental consequences. In summary, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy inconsistencies illustrate that the application is incomplete and fails to support a lawful determination. In light of these issues, 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.

ASSESSMENT OF ALTERNATIVES

The proposed project lacks a sufficient assessment of alternatives and does not adhere to the statutory requirements outlined in the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of feasible alternatives based on their environmental effects, the application only provides a narrative account detailing the evolution of the project. This method does not adequately demonstrate that less harmful options have been identified, assessed, and selected over more damaging alternatives.

Furthermore, there is a lack of transparent, evidence-based comparisons of different offshore locations, development scales, and design configurations. The developer has not convincingly considered the possibility of placing turbines further offshore, where the potential visual, ecological, and coastal impacts could be lessened. Given the sensitivity of the West Lewis coastline and the critical role that proximity to the shore plays in impact assessments, the absence of such analysis undermines any assertion that the proposed siting is the least damaging option available.

The inadequacies also extend to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been adequately explored to 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 analyses suggest that mitigation by design has not been adequately applied, instead relying heavily on post-design mitigation measures.

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

From a policy standpoint, this inadequacy undermines compliance with National Planning Framework 4, particularly regarding the protection of natural spaces, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission, contributing to the conclusion that the application has not undergone adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed assessment of marine ecology and protected species is fundamentally inadequate, lacking a comprehensive and reliable understanding of the ecological receptors present within the West Lewis coastal environment. This area is a biologically active marine system, yet the baseline data provided is insufficient, and the methodologies employed do not effectively capture crucial information regarding species presence, behaviour, and habitat utilisation. Consequently, the assessment fails to establish a robust evidential foundation for evaluating potential impacts.

Significant omissions are evident, particularly concerning otters, which are classified as a European Protected Species. The application does not adequately recognise or assess their utilisation of coastal areas for foraging and movement. By neglecting to consider their core foraging range and behavioural patterns, the potential implications of construction disturbance, noise, and increased human activity remain inadequately evaluated. This oversight undermines any claims regarding the absence of significant effects on this species.

Further issues are present in the assessment of basking sharks, where an overreliance on aerial surveys leads to considerable detection bias, especially under Atlantic conditions. Such an approach is likely to underestimate the presence of these sharks, particularly when compared to established land-based observations that indicate their frequent use of these waters. The failure to appropriately incorporate or consider this data results in an incomplete baseline, thereby weakening the reliability of the conclusions drawn.

These methodological shortcomings mean that any conclusions suggesting negligible or non-significant effects are based more on assumptions than on sound evidence. The lack of adequate baseline data further obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation generates uncertainty about the actual risk posed to marine species and habitats.

From a regulatory viewpoint, the application does not fulfil the requirements set by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced prevents any exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the precautionary principle. Given these circumstances, it is not lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed and lacks reliable evidence. It has significant gaps and internal inconsistencies that challenge its conclusions. Key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which are home to important seabird populations that are already in decline, are not adequately addressed in the application. The developers have failed to demonstrate that these species will not be adversely affected, as the assessment does not effectively evaluate the risks of displacement, collision, or habitat loss.

There is a notable contradiction in the application, where the developer claims that there will be no significant adverse effects while also pursuing a Habitats Regulations

derogation case. This latter case is typically only necessary when significant harm is anticipated, raising doubts about the credibility of the assessment and suggesting that its conclusions lack solid evidence.

The assessment falls short in demonstrating that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. It does not adequately consider the significance of these feeding grounds, and its reliance on modelling approaches creates uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. The methodologies used are likely to underestimate potential mortality rates, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Locating turbines within a recognised migratory corridor presents additional risks, effectively blocking a primary flight path for species migrating between the United Kingdom and Iceland. The long-term consequences of sustained mortality in this corridor and the potential impacts on species with limited global populations have not been sufficiently assessed.

From a regulatory standpoint, the application does not meet the required evidential standard to establish that there will be no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, coupled with data gaps and limitations in modelling, fails to satisfy the requirement of beyond reasonable scientific doubt. This situation invokes the precautionary principle, which prohibits a lawful conclusion in favour of consent.

The identified deficiencies also indicate non-compliance with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The proposal's inability to demonstrate that internationally important seabird populations will remain unaffected is at odds with national policy.

Overall, the assessment lacks reliability due to its internal inconsistencies, methodological flaws, and insufficient evidence. These issues hinder a proper evaluation of impacts and lead to the conclusion that the application does not fulfil the statutory requirements needed 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 developer commissioned a Social Impact Assessment, which included focus groups with local residents, yet the full report remains unpublished. This lack of disclosure constitutes a significant evidential gap that hinders the public and the competent authority from grasping the complete scope of social risks identified in the developer’s own research.

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

assess their significance in the decision-making process.

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

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

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

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment, representing a material omission within the application and a failure to fulfil the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, alongside evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This deficiency prevents a lawful determination and underscores that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts associated with the proposed development is significantly inadequate, failing to account for the scale of change and the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon, a largely undeveloped nature, and a profound sense of remoteness. The proposed large-scale turbines, positioned close to the shoreline, would establish a continuous industrial presence that would fundamentally alter this character, resulting in a permanent transformation of the landscape.

Moreover, the application does not adequately illustrate the extent of this visual change. Due to their size and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, adversely affecting visual amenity and diminishing the qualities of naturalness and remoteness. The

assessment fails to effectively communicate the significance of these impacts within the context of such a sensitive landscape.

Concerns also arise regarding the choice and presentation of visual viewpoints. There is evidence to suggest that these viewpoints do not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises the possibility that the visual impact has been understated, casting doubt on the reliability of the overall assessment.

Additionally, the assessment neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are intricately linked to the surrounding landscape and the Atlantic horizon. The evaluation treats these sites as isolated entities, overlooking their interdependence and resulting in an incomplete assessment of their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and disconnecting them from their natural context. This not only presents a visual impact but also signifies broader cultural and spatial harm, which has not been adequately addressed in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the protection of natural places and historic assets. The extent of change proposed is at odds with the obligation to preserve landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a thorough worst-case assessment further undermines any assertion of compliance with policy.

The identified impacts are inherently unmitigable. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the change to the landscape is fundamental and permanent, incapable of being reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal involves 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 provided with the application. Instead, it relies on mitigation and contingency measures that are to be prepared post-consent, which prevents any meaningful assessment of their adequacy or

effectiveness.

The sensitivity of the receiving environment raises further concerns. The West Lewis coastline is known for its clean coastal waters and important habitats that are vulnerable to disturbance and contamination from sediment. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not sufficiently detail how these risks will be prevented, controlled, or monitored.

Additionally, there is uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, 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 already identified as sensitive in the wider assessment.

The absence of detailed emergency response procedures further exacerbates these issues. By deferring contingency planning until after consent, the application undermines the ability to evaluate whether appropriate safeguards are in place to respond to pollution events, introducing procedural risk that hinders the competent authority's capacity to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to consent, and without this information, a lawful determination cannot be made. The application also fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application does not provide a thorough evaluation of the ecological or socio-economic impacts, failing to demonstrate that these important habitats and activities can be protected without significant disruption.

A major concern is the assumption that fishing activity can be displaced without consequences. There is no evidence presented that alternative fishing grounds are available or able to handle increased pressure. This lack of information is critical, as displacement could lead to overfishing in other areas and potentially have wider economic repercussions for the local fishing fleet. Without a clear, evidence-based

assessment, the effects on fisheries and livelihoods remain unclear.

The proposal also poses considerable risks to marine species, particularly due to underwater noise from construction activities. The extended use of high-energy hammer piling is likely to disturb marine life over large distances, affecting species such as dolphins. The application downplays the predicted impact on a significant portion of the local bottlenose dolphin population, raising serious concerns without adequate supporting evidence.

Furthermore, there is an inconsistency in the application regarding the need for licences to harm European Protected Species, while simultaneously claiming that impacts are negligible. This contradiction undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where harm is expected to occur at a level that requires legal authorisation.

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

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not show that the development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, hindering any conclusion that the proposal represents 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 unreliable. These shortcomings prevent a thorough evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents a significant challenge due to its fragmented assessment of onshore infrastructure, which is insufficient and does not account for the entirety of impacts associated with the integrated project. The offshore turbines and onshore works are interdependent, yet they are evaluated in isolation, leading to an incomplete understanding of the environmental and socio-economic consequences of the project.

Key onshore elements of the proposal encompass cabling that crosses protected moorland, the construction of a substation close to Stornoway, and the creation of access infrastructure that traverses sensitive landscapes. Notably, these activities involve excavation in areas of deep peat, especially within Barvas Moor, an important carbon store and ecologically significant habitat. The lack of a thorough assessment regarding these impacts results in an inadequate comprehension of the project's overall environmental footprint.

This omission of onshore impact assessments prevents a proper evaluation of cumulative effects, as the Environmental Impact Assessment process mandates that all project components be considered collectively. The disjointed analysis of offshore and onshore elements obscures the understanding of combined impacts on peatlands, habitats, and local communities.

Additionally, there are substantial risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application fails to establish that impacts on these critical habitats have been thoroughly evaluated or that adequate avoidance measures have been incorporated. This situation leads to a significant evidential gap concerning biodiversity protection.

Concerns also arise around the project's carbon balance. The disruption of peatland can release sequestered carbon, which might create a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this matter or confirm that the overall carbon balance remains advantageous.

Moreover, the planned routing of infrastructure through active croft land brings potential conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, which raises questions regarding the feasibility and lawful execution of the project.

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

In conclusion, the separation of project elements, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts culminate in an incomplete and unreliable application, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife in the Environmental Impact Assessment represents a significant omission. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism appeal. The proposed introduction of permanent red aviation lighting, visible over long distances, would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

The application fails to evaluate how this lighting may impact visual amenity, landscape character, and the experiences of both residents and visitors. This is especially pertinent given the importance of dark skies to the region's identity and the emerging tourism sector focused on astro-tourism. The lack of consideration for these impacts

represents a clear gap in the overall landscape and environmental assessment.

Moreover, there is no analysis of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial lighting due to their phototactic responses, which can lead to disorientation and increased risks of collision. The absence of any lighting impact assessment or phototaxis study in the application means that the potential effects on these species and the likelihood of increased mortality are not addressed.

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

Without an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, thereby 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 also weakens the broader assessment of landscape and seascape impacts, as the character of the night-time environment is an essential aspect of the overall ecosystem.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. This application reiterates the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Now, it is presented under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis for this application is incomplete and unreliable. There are significant gaps in the baseline data, and it continues to utilise an undefined design envelope. Moreover, it relies on unspecified mitigation measures and overlooks essential impact pathways, including those affecting nocturnal wildlife, the full extent of onshore infrastructure, and tourism. As such, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of likely significant

effects or residual impacts.

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

The proposal conflicts directly with National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage, fails to establish that health and wellbeing impacts are acceptable, and cannot substantiate a net economic benefit due to the absence of tourism impact modelling. Furthermore, the cumulative impacts of both offshore and onshore elements have not been thoroughly assessed, obscuring potential 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, at times, inconsistent. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been satisfied, thus engaging the precautionary principle and precluding any lawful conclusion regarding the acceptability of impacts.

Additionally, the proposal would cause substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual relationships, and 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, combined with policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority must refuse consent on these grounds or employ relevant regulatory provisions to compel the submission of the missing information.

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

Additional Comments

This project does not take into consideration local opinion on the matter. It provides little benefit to the people of the island and instead will significantly impact on the environment, nature and animals as well as ruining the landscape and view for many.

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: 1D1D6F90

Member of the public 985

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted in accordance with the marine licensing and Environmental Impact Assessment regulations. It arises from a thorough examination of the Environmental Impact Assessment Report and associated documents, revealing significant deficiencies related to planning, the environment, cultural factors, and procedural aspects. The proposed development is situated off the west coast of the Isle of Lewis, known for its Atlantic-facing coastline, nearly untouched natural surroundings, and rich cultural heritage. Concerns about the scale, design, and proximity of the development call into question its alignment with statutory mandates, national policies, and the core principles of sustainable development.

The application does not present a sufficient evidential basis for a lawful decision. There is a lack of critical environmental data, inconsistencies in baseline information, and several essential elements of the proposal remain unclear. The implementation of a flexible design framework obscures the potential significant effects, while the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the available documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or insignificant effects lack robust support.

Substantial conflicts with policy are evident. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment framework, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health. It does not demonstrate that national obligations to safeguard biodiversity, address climate issues, and maintain environmental integrity can be fulfilled. These discrepancies are fundamental to the statutory criteria for consent and compromise the capacity of the relevant authority to determine the project's acceptability in policy contexts.

The unprecedented scale of this proposal, with large turbines positioned alarmingly close to the shoreline, raises serious issues regarding landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of adequate information, dependence on undefined mitigation measures, evidential shortcomings, and clear policy violations indicate that the application is incomplete and cannot support a lawful decision. Under these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies in the Environmental Impact Assessment Report are glaring, rendering it materially inadequate and failing to offer a full, transparent, or reliable account of the potential environmental effects linked to the proposal. The reliance on a flexible Project Design Envelope, lacking any commitment to definitive turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This uncertainty obstructs a consistent application of a worst-case scenario, compromising the integrity of the assessment and inhibiting both the public and the competent authority from grasping the true scale of environmental impacts.

Moreover, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consent is sought on the premise that environmental harm will be mitigated later, which hinders any meaningful evaluation of their effectiveness or the assessment of residual impacts. This delay in providing essential information until after consent is procedurally unacceptable and undermines the fundamental aims of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigation strategies be clearly established prior to decision-making.

Evidential deficiencies are also present, marked by gaps in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially in cases where negligible or non-significant effects are concluded without robust supporting data. The lack of sufficient information inhibits a comprehensive understanding of cumulative and worst-case impacts, introducing scientific uncertainty that contradicts statutory requirements.

As a result, the application does not meet the evidential threshold set by the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This scenario invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes stipulations regarding biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is fundamentally inadequate, failing to deliver a comprehensive and trustworthy understanding of ecological receptors in the West Lewis coastal environment. This marine system is highly sensitive and biologically active; however, the baseline data is incomplete, and

the methodologies used do not adequately capture species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

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

Further shortcomings exist in the assessment of basking sharks, where a reliance on aerial surveys creates a substantial detection bias, particularly under Atlantic conditions. This methodology is likely to underrepresent their presence, especially when juxtaposed with established land-based observations that demonstrate frequent usage of these waters. The neglect to incorporate or thoroughly evaluate such data leads to an incomplete baseline and compromises the reliability of the findings.

The methodological flaws mean that the conclusions of negligible or non-significant effects are based more on assumptions than on solid evidence. Moreover, the absence of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This generates uncertainty about the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been appropriately identified or assessed. The uncertainty involved prevents any exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In this context, granting consent cannot be justified lawfully.

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

CONSTRUCTION AND POLLUTION RISKS

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

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

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

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

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

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

FISHERIES AND MARINE LIFE

The proposed application raises significant concerns regarding its assessment of fisheries and marine life. The waters off the West Lewis coast are home to a diverse marine ecosystem and a vibrant fishing industry, yet the evaluation does not adequately address how these essential habitats and activities will be protected or maintained.

A critical flaw in the assessment is the assumption that fishing can be relocated without negative effects. There is no evidence provided that alternative fishing grounds exist or are capable of sustaining the added pressure from displaced activities. This lack of information is crucial, as such displacement could lead to overfishing in different areas and have broader economic repercussions for the local fishing fleet. Without a thorough and evidence-based evaluation, the impacts on both fisheries and

local livelihoods remain unclear.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise generated by construction activities. The use of high-energy hammer piling for extended periods is likely to disturb marine life over considerable distances, notably affecting species like dolphins. The anticipated disturbance to a large portion of the local bottlenose dolphin population raises serious issues. However, the application appears to minimise these concerns without providing adequate supporting evidence.

There is also a notable inconsistency in the application regarding the necessity of licences for any harm to European Protected Species. While it acknowledges the need for legal authorisation where harm is anticipated, it simultaneously asserts that the impacts are negligible. This contradiction calls into question the reliability of the assessment and raises issues about compliance with the Habitats Regulations.

Furthermore, the evaluation does not adequately consider the cumulative impacts from various pressures, such as habitat disruption, noise, and the displacement of fishing activities. Without a comprehensive analysis of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not show that the proposed development can coexist with current marine users or avoid significant negative impacts on marine biodiversity, which obstructs any conclusion that it represents sustainable development.

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

TOURISM

The application acknowledges that 86% of visitors to the Isle of Lewis are attracted by its scenery, yet it does not provide a quantified assessment of how large-scale offshore infrastructure could influence visitor numbers or the overall economic contribution of tourism. This is particularly concerning given that tourism has experienced significant growth, increasing from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs. The sector accounts for as much as 16% of the island's economy. However, the application does not model the potential economic impacts of industrialisation on the seascape or the resulting loss of environmental quality. Without this analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment neglects to consider the vital role of environmental quality in enhancing the tourism experience. Unspoiled landscapes and dark skies are crucial to

attracting visitors, particularly in emerging markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this oversight, creating a notable gap in the understanding of the proposal's effects on a recognised and growing segment of the local economy.

In an island community with limited economic diversification, the lack of analysis regarding tourism impacts bears broader implications for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated, contrary to the requirements of the Islands (Scotland) Act 2018.

From a policy standpoint, the application falls short in demonstrating compliance with National Planning Framework 4, particularly regarding economic impact and the necessity to show a net benefit. It conflicts with strategic objectives that designate tourism as a priority growth sector and does not provide adequate evidence for the competent authority to assess the economic consequences of the proposed development.

Taken together, the inadequacies in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and recognising the island's economic dependency create a substantial evidential gap. This gap hinders a thorough evaluation of the economic effects of the proposal and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development, as assessed against statutory duties, national policy, and evidential standards. It mirrors the core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This current application, despite being presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, does not provide a complete or reliable evidential basis for determination.

There are critical gaps in baseline data, reliance on an undefined design envelope, and unspecified mitigation measures. Furthermore, significant impact pathways such as nocturnal wildlife, complete onshore infrastructure, and tourism effects have been omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of the likely significant effects or residual impacts.

Procedural failures are also evident. The lack of a compliant Island Communities Impact Assessment breaches the statutory duty under the Islands (Scotland) Act 2018, while the failure to disclose the full Social Impact Assessment is a material 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 is in direct conflict with National Planning Framework 4. It does not demonstrate protection for biodiversity, natural places, and cultural heritage. Moreover, it fails to establish 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 impact of both offshore and onshore elements has not been adequately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in places. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle and prevents a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

It’s deeply concerning that this projected seems to have been progressed through the back door so to speak. I have a deep infinity with the islands with both parents being islanders. I spend my summers on the islands as a child and now as an adult own a property on the islands.
Island life is unique and hard at times. It’s that uniqueness that draws people from all over the world to visit them bringing much needed financial security to many small businesses. To blight the landscape with turbines of this size will put at risk an already fragile island economy. Tourism is a key driver on the islands, would tourists come if faced by these structures which would spoil the very fabric of the islands peace and tranquility.
Does a cycle path really cut it as a benefit to the islands? I think not. (The council could commission one without this)
Yes investment is needed badly for island economies but it needs to be the right

investment that embraces what island life is all about. Success stories such as the Harris distillery need to be replicated throughout the islands. Local authorities and SG need to make legislation easier to enable entrepreneurs.
The waters around the islands are recognised as being some of the purest in the world. The fish and shellfish are sought after and sold worldwide yet we seem prepared to put this vital element of the economy at risk for a 35yr project.
The draw to the islands is well documented for both land and sea wildlife whether it be migrating birds or the many whales which swim through its waters. Again at risk due to a 35yr project.
For me this is firmly a NO.

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: AE911C8F

Member of the public 986

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. It is based on a review of the Environmental Impact Assessment Report and related documents, highlighting significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline and cultural identity. Concerns arise from the scale, proximity, and design of the project, which question its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential basis necessary for a lawful determination. Important environmental data is absent, baseline information is inconsistent and limited, and crucial elements of the proposal are not clearly defined. The flexible design framework employed does not provide clarity on likely significant effects, while unspecified mitigation measures hinder the assessment of their effectiveness. Consequently, the available documentation does not allow for a comprehensive understanding of the potential impacts on the environment, culture, or community, and claims regarding negligible or non-significant effects lack robust evidence.

There are evident and serious conflicts with policy. The proposal contradicts the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, particularly concerning biodiversity, cultural heritage, and public health. It does not sufficiently demonstrate that it can meet national requirements to safeguard biodiversity and environmental integrity. These inconsistencies directly challenge the statutory tests for consent and weaken the ability of the relevant authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of the project raises significant issues, as large turbines will be placed near the shoreline. This introduces serious concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. Therefore, the precautionary principle should be applied in this situation.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application presents significant evidential deficiencies, characterised by gaps in baseline data and limitations in methodology. It relies on assumptions rather than site-specific evidence, resulting in uncertainty regarding the scale and significance of impacts. Specifically, conclusions regarding negligible or non-significant effects are not

backed by robust supporting data. This lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that is incompatible with statutory requirements.

Moreover, the Environmental Impact Assessment Report is materially deficient, lacking a full, transparent, or reliable account of the likely environmental effects of the proposal. The proposal utilises a flexible Project Design Envelope that does not commit to specific turbine dimensions, layouts, or configurations. This introduces significant uncertainty and hinders the consistent application of a worst-case scenario. Consequently, the impacts presented may not accurately reflect the development that is ultimately constructed, which prevents both the public and the competent authority from comprehending the true extent of environmental effects.

Consent is sought based heavily on mitigation measures, monitoring strategies, and management plans that have yet to be defined. This approach means that environmental harm is intended to be addressed at a later stage, thereby obstructing any meaningful evaluation of effectiveness or assessment of residual impacts. Such deferral of key information to post-consent stages is procedurally unacceptable, undermining the fundamental purpose of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation are clearly established prior to determination.

In light of these deficiencies, the application does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This raises concerns regarding the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, which includes requirements related to biodiversity protection and environmental integrity, as it cannot be established that impacts have been fully assessed or that appropriate safeguards are in place.

Overall, the 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 robust assessment of environmental effects and place the competent authority in a position where it cannot adequately determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application suffers from significant shortcomings in its assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. It presents a narrative account of project evolution rather than a structured and reasoned comparison of realistic alternatives based on their environmental impacts. This method does not adequately demonstrate that less harmful options have been appropriately identified, assessed, and chosen over more damaging solutions.

The lack of a transparent and evidence-based comparison extends to the evaluation of offshore locations, development scales, and design configurations. Notably, there is no indication that the developer has seriously contemplated placing turbines further offshore, which could potentially reduce visual, ecological, and coastal impacts. The sensitive nature of the West Lewis coastline highlights the importance of proximity to shore in determining impact, and without such analysis, it is impossible to assert that the proposed siting is the least damaging option available.

Moreover, the deficiencies are evident in the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to avoid or lessen impacts on sensitive receptors, including culturally significant sites such as Barvas Cemetery. The absence of a clear strategy to avoid impacts and the lack of comparative analysis suggest that the concept of mitigation by design has not been implemented, relying instead on post-design mitigation measures.

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

From a policy standpoint, these deficiencies cast doubt on compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a significant gap that contributes to the conclusion that the application has not been sufficiently evaluated and cannot 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 assessment of the proposed development presents significant flaws, revealing gaps in evidence and internal inconsistencies that cast doubt on its conclusions. The application fails to demonstrate that internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, will not suffer adverse effects. These seabirds rely on key foraging areas and migratory pathways that the development would disrupt, yet the assessment neglects to thoroughly evaluate the implications of displacement, collision risk, or habitat loss.

A critical contradiction emerges within the application itself. The developer claims there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is typically warranted when significant harm is anticipated. This inconsistency raises serious questions about the validity of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence. Furthermore, the assessment lacks adequate proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not properly recognised, and reliance on modelling introduces uncertainty, particularly for declining species like Kittiwakes and Fulmars. Methodologies used are likely to underestimate mortality rates, especially given the incomplete baseline data and insufficient understanding of behavioural

responses.

The placement of turbines within a recognised migratory corridor poses an additional, serious risk, as it could effectively obstruct a primary flight path used by birds migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term effects of sustained mortality in this corridor or the potential impact on species that have relatively small global populations.

From a regulatory standpoint, the application falls short of the evidential standards required to confirm no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside data gaps and modelling limitations, indicates that the threshold of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, thereby hindering a lawful conclusion in favour of consent. Moreover, the identified deficiencies reflect a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected directly contradicts national policy.

Overall, the assessment is deemed unreliable due to its internal inconsistencies, methodological shortcomings, and lack of substantial evidence. These deficiencies obstruct a thorough evaluation of the potential impacts and contribute to the conclusion that the application fails to satisfy the statutory requirements essential for determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development, with its large-scale turbines near the West Lewis coastline, threatens to fundamentally alter the character of this region. This coastline is defined by its open Atlantic horizon, undeveloped character, and a profound sense of remoteness. The introduction of such industrial structures in close proximity to the shoreline would create a continuous and overwhelming presence that would result in a permanent and irreversible transformation of the landscape.

The assessment provided does not adequately represent the scale of the visual change that would occur. The turbines' height and proximity would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the essential qualities of naturalness and remoteness. The significance of this impact is not properly conveyed within the current assessment, leaving a considerable gap in understanding the effect on this sensitive landscape.

Moreover, there are serious methodological concerns regarding the selection of visual viewpoints. It appears that some viewpoints may fail to fully capture the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been understated, thus compromising the reliability of the assessment.

Another critical deficiency is the lack of consideration for the interconnected

relationship between landscape, seascape, and cultural heritage. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a larger landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these as isolated entities, neglecting their interdependence, which results in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these connections, altering how heritage assets are experienced and disrupting their relationship with the natural horizon. This transformation represents not just a visual impact, but also a broader cultural and spatial harm that has not been sufficiently assessed within the application.

From a policy standpoint, the proposal conflicts directly with National Planning Framework 4, particularly concerning the safeguarding of natural places and historic assets. The proposed scale of change is incompatible with the necessary protection of landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertion of policy compliance.

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

In conclusion, the assessment fails to accurately reflect the magnitude of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These significant deficiencies hinder a reliable evaluation and confirm that the proposal is incompatible with the protection of this vital landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is home to clean coastal waters and important habitats that are particularly sensitive to sediment disturbance and contamination. The proposed project involves significant seabed preparation and installation works within the challenging conditions of a high-energy Atlantic environment. However, the assessment of construction and pollution risks associated with this proposal is incomplete, lacking the detail necessary to properly evaluate the likely environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans presented in the application. Instead, it relies on mitigation and contingency measures that are intended to be prepared post-consent, which prevents any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises significant concerns due to the sensitivity of the receiving environment. While the application acknowledges risks, including sediment mobilisation and accidental chemical or oil spills, it does not provide sufficient information on how these risks will be prevented, controlled, or monitored. Furthermore, there is uncertainty about the scale and behaviour of

sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to determine the extent, duration, or ecological effects of these potential impacts, including those on marine species and habitats already identified as sensitive in the broader assessment.

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

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

FISHERIES AND MARINE LIFE

The application fails to provide a comprehensive assessment of fisheries and marine life, resulting in an inadequate evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the proposal does not demonstrate how these vital uses and habitats can be adequately protected or maintained without causing significant disruption.

One critical concern is the flawed assumption that fishing activities can be displaced without consequences. The application lacks evidence that alternative fishing grounds are available, accessible, or capable of supporting the additional pressures from such displacement. This significant oversight raises the risk of overfishing in other areas and may lead to wider economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the true impacts on fisheries and livelihoods remain unclear.

Additionally, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended duration is likely to create disturbances over large distances, adversely affecting species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application downplays these effects, lacking adequate supporting evidence.

There are notable inconsistencies within the application itself; it acknowledges the necessity of licenses to permit harm to European Protected Species while

simultaneously describing the impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially when harm is expected to a degree that requires legal authorisation.

Moreover, the assessment overlooks the cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be adequately assessed.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents a series of significant concerns regarding its treatment of onshore infrastructure, which is assessed in isolation from the offshore components of the project. This fragmented approach obscures the true environmental and socio-economic impacts, as the onshore works, including cabling through protected moorland, the construction of a substation near Stornoway, and the required access infrastructure, are intrinsically linked to the offshore turbines.

A critical element of the onshore infrastructure is the excavation across areas of deep peat, particularly in Barvas Moor, which serves as both an ecologically sensitive habitat and a substantial carbon store. The failure to provide a comprehensive assessment of these impacts limits the understanding of the project's overall environmental footprint, leaving essential questions unanswered.

Moreover, the application does not adequately consider the cumulative effects of separating the assessments for offshore and onshore components. The Environmental Impact Assessment process mandates that all elements of a project be evaluated collectively. Consequently, the separation prevents a thorough understanding of the combined impacts on peatlands, habitats, and local communities.

Sensitive habitats, including machair systems and peatland environments, are at risk, and the application falls short in demonstrating that these impacts have been fully assessed or that necessary avoidance measures are in place. This oversight highlights a significant gap in the evidence required for biodiversity protection. Additionally, the

disturbance of peatland raises concerns about carbon balance, as released stored carbon could create a carbon debt, undermining the aims of renewable energy initiatives.

There are also serious implications for land use, particularly with the routing of infrastructure through active croft land. The application lacks evidence that it has obtained the necessary consents or initiated appropriate processes, which raises questions about the feasibility and legality of the project.

From a policy standpoint, the failure to evaluate the project as an integrated whole, coupled with the inadequate protection of peatlands, habitats, and land use rights, conflicts with the National Marine Plan and National Planning Framework 4. The inability to demonstrate effective avoidance or mitigation strategies further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife in the Environmental Impact Assessment represents a significant evidential gap. The West Lewis coastline is noted for its exceptionally dark skies, which are essential to the region's environmental quality, cultural identity, and tourism potential. The proposed development would introduce permanent red aviation lighting, which would be visible over considerable distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon, thereby fundamentally altering the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This gap is particularly notable given the significance of dark skies to the area's identity and the growth of tourism sectors, such as astro-tourism. The neglect of these impacts represents a shortfall in the overall landscape and environmental assessment.

Moreover, there is no analysis of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be highly sensitive to artificial lighting, which can result in disorientation and heightened collision risks. The application does not include any lighting impact assessment or phototaxis study, thereby failing to assess the potential effects of aviation lighting on these species and the risk of increased mortality.

This deficiency is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or related risks. Other species, such as Kittiwakes, which may forage or migrate at night, are similarly vulnerable to disorientation due to artificial lighting, yet this risk has not been

addressed. The lack of site-specific night-time data creates a substantial gap in understanding the ecological impacts.

In the absence of an evaluation of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt is not satisfied, invoking the precautionary principle and hindering a lawful determination.

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

In summary, the lack of any assessment concerning dark skies and nocturnal wildlife signifies a major evidential deficiency. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unable to facilitate a lawful determination.

SUMMARY

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

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

Moreover, there are evident procedural failures. The lack of a compliant Island Communities Impact Assessment violates statutory obligations set out in the Islands (Scotland) Act 2018. Additionally, the failure to disclose a full Social Impact Assessment constitutes a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies render the application unsuitable for determination.

The proposal also contradicts the National Planning Framework 4 by failing to demonstrate adequate protection for biodiversity, natural environments, and cultural heritage. It does not adequately address health and wellbeing impacts or provide

evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore elements have not been thoroughly assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

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

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

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

Additional Comments

I am appalled at these plans to build a wind farm in such a naturally rich, diverse and unique environment. The impact on those living in this area of the Outer Hebrides will be detrimental and long lasting. It will not benefit the islanders.

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: D056ABCB