

**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 relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report and accompanying documents, which reveal significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of the development raise serious concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application does not present an adequate evidential foundation for a lawful decision. There are notable gaps in critical environmental data, while the baseline information is both limited and inconsistent. Furthermore, essential elements of the proposal remain undefined. The reliance on a flexible design framework complicates the assessment of likely significant effects, and the proposed mitigation measures have not been specified, rendering their effectiveness impossible to evaluate. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidential support.

Substantial policy conflicts are evident. The proposal appears to conflict 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 satisfactorily 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 weaken the competent authority's ability to determine the acceptability of the development in policy terms.

The unprecedented scale of the proposal in this location, with large turbines positioned near the shoreline, raises significant issues regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle must be applied.

**ASSESSMENT OF ALTERNATIVES**

The inadequacy of the alternatives assessment is significant, as it does not adhere to the statutory requirements of the Environmental Impact Assessment regime. The application offers a narrative of the project's evolution rather than a structured, reasoned comparison of realistic alternatives based on their environmental effects. This method fails to show that less harmful options have been properly identified, assessed, and selected in favour of more damaging solutions.

The lack of transparent and evidence-based comparisons of alternative offshore locations, development scales, and design configurations is particularly concerning. The application does not convincingly demonstrate that the developer has given serious consideration to locating turbines further offshore, where the visual, ecological, and coastal impacts would likely be less severe. The West Lewis coastline is sensitive, and the crucial role of proximity to shore in determining impact highlights the critical need for this analysis; without it, there is no basis for concluding that the proposed siting represents the least damaging option.

This issue extends to the cable routing and landfall assessment, as there is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The absence of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been implemented, with an overreliance on post-design mitigation measures. Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing.

This failure to adhere to the established mitigation hierarchy hinders the competent authority's ability to ascertain whether less harmful and more appropriate alternatives exist. Without a comprehensive alternatives assessment, it cannot be concluded that the proposal is a sustainable or policy-compliant solution. From a policy standpoint, this deficiency compromises compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment represents a material omission that reinforces the conclusion that the application has not been adequately assessed and cannot support a lawful determination.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The assessment 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 is situated within key foraging areas and migratory pathways crucial for internationally important seabird populations along the west coast of the Isle of Lewis, many of which are in decline. However, the ornithological assessment fails to provide sufficient evidence demonstrating that these species will not be adversely affected. The evaluation does not adequately address the implications of displacement, collision risk, or habitat loss, which raises significant concerns.

There exists a fundamental contradiction within the application. The developer concludes that there are no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency undermines the reliability of the assessment and

suggests that the conclusions drawn are not substantiated by the evidence presented.

Furthermore, the assessment does not convincingly show that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not thoroughly recognised, and the reliance on modelling approaches generates uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. Methodologies employed are likely to underestimate mortality rates, especially in light of incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor presents an additional, considerable risk, creating a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term 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 fulfil the evidential threshold necessary to conclude that there is no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and hinders a lawful conclusion in support of consent.

Moreover, the deficiencies highlighted constitute a failure to comply with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected directly conflicts with national policy.

In summary, the assessment is rendered unreliable due to internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. These deficiencies obstruct a thorough evaluation of impacts and support the conclusion that the application does not meet the statutory requirements for determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

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

There is a notable shortfall in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are characterised. These sites are active burial grounds and places of spiritual significance, but the assessment simplistically categorises them as unchanging features. This failure to recognise their ongoing use and meaning, along with the potential impact of the development on their surroundings, leads to an incomplete understanding of the cultural ramifications and overlooks their significance

in community life.

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

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

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

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

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

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

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

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

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

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

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

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

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

### **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

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

The application does not sufficiently represent the magnitude of visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and widely used coastal locations, directly impacting visual amenity and undermining the defining qualities of naturalness and remoteness. This level of impact and its significance within such a sensitive landscape have not been properly conveyed

in the assessment.

Moreover, there are methodological concerns regarding the selection and presentation of visual viewpoints. Evidence suggests that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. Such shortcomings risk understating the magnitude of visual impact, thus undermining the reliability of the assessment.

The assessment also neglects to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, like the Calanais Standing Stones and other Scheduled Monuments, are integral to a wider landscape setting connected by visual and spatial relationships to the Atlantic horizon. Treating these assets in isolation fails to acknowledge their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural significance.

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

From a policy perspective, the proposal is at odds with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The scale of change is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further undermines any claim of compliance with policy.

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

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

## **CONSTRUCTION AND POLLUTION RISKS**

The absence of clearly defined mitigation measures and detailed management plans significantly undermines the proposal. Without fully developed Construction Environmental Management Plans or Pollution Prevention Plans, the assessment of construction and pollution risks remains materially deficient. This situation prevents a thorough evaluation of potential environmental effects, particularly given the substantial seabed preparation and installation works planned for a high-energy Atlantic environment.

The application acknowledges various risks such as sediment mobilisation and accidental chemical or oil spills; however, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored. The uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation further complicates the ability to ascertain the potential ecological effects. Robust modelling and clearly defined management strategies are essential to understanding the extent and duration of these impacts, particularly concerning sensitive marine species and habitats identified within the wider assessment.

Concerns are further amplified by the absence of detailed emergency response procedures. Deferring contingency planning to a post-consent stage not only raises procedural risks but also undermines the capacity of the competent authority to assess the proposed environmental protection measures at the point of determination. This deferral conflicts with the requirements of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be assessed before consent is granted.

The application's failure to demonstrate compliance with policy requirements regarding environmental protection and water quality further highlights its inadequacies. Taken together, these issues contribute to the conclusion that the proposal is fundamentally incomplete, lacking the necessary information for a robust evaluation of construction and pollution risks.

## **FISHERIES AND MARINE LIFE**

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. However, the application does not provide a robust evaluation of ecological or socio-economic impacts, failing to demonstrate that these crucial uses and habitats can be protected or maintained without significant disruption. A critical concern is the erroneous assumption that fishing activity can be displaced without consequence. The application lacks evidence that alternative fishing grounds are available, accessible, or capable of supporting additional pressure, which is a significant omission. This lack of clarity risks not only overfishing elsewhere but also threatens the economic stability of the local fleet.

Moreover, the proposal presents substantial risks to marine species, particularly due to the underwater noise generated during construction activities. High-energy hammer piling for extended periods is expected to disturb marine life over large distances, notably affecting species such as dolphins. The anticipated disturbance to a significant proportion of the local bottlenose dolphin population is alarming, yet the application downplays these impacts without adequate supporting evidence.

Inconsistencies within the application further undermine its credibility. While it acknowledges the necessity for licences to permit harm to European Protected Species, it simultaneously describes the anticipated impacts as negligible. This contradiction raises serious concerns regarding compliance with the Habitats Regulations, particularly since harm is anticipated to a degree that requires legal

authorisation.

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

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

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

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The application presents significant deficiencies in the assessment of onshore infrastructure, failing to address the comprehensive range of impacts associated with what constitutes a single integrated project. While the offshore turbines and onshore works are inherently connected, they have been evaluated separately, resulting in a fragmented analysis that obscures the true extent of environmental and socio-economic consequences.

The onshore components of the project encompass cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which is recognised as a significant carbon store and an ecologically sensitive habitat. The lack of a thorough assessment concerning these impacts precludes a complete understanding of the project's overall environmental footprint.

Furthermore, the exclusion or deferral of onshore impact assessments obstructs the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively; however, the current separation of offshore and onshore components means that the combined impacts on peatlands, habitats, and local communities remain inadequately understood.

Significant risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy, have not been fully appraised within the application. It remains unclear whether appropriate avoidance measures have been implemented, thus highlighting a substantial evidential gap in relation to biodiversity

protection.

The proposal also raises critical concerns regarding carbon balance. Disturbance of peatland has the potential to release stored carbon, thereby creating a carbon debt that conflicts with the aims of renewable energy development. The application does not sufficiently address this matter nor does it convincingly demonstrate that the overall carbon balance remains favourable.

In addition, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application fails to provide adequate evidence that necessary consents or processes have been initiated, which raises questions concerning the deliverability and lawful implementation of the project.

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

In summary, the disjunction in assessing project components, the absence of a comprehensive evaluation, and the insufficient evidence regarding environmental and land use impacts culminate in an application that is incomplete and unreliable, thus hindering a lawful determination.

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The omission of an assessment concerning dark skies and nocturnal wildlife within the Environmental Impact Assessment represents a critical gap. The West Lewis coastline boasts exceptionally dark skies, which are integral to its environmental quality, cultural identity, and tourism value. The proposed installation of permanent red aviation lighting, visible over long distances, would create a persistent and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

Significantly, the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors has not been evaluated. This is particularly concerning given the importance of dark skies to the area's identity and the burgeoning tourism sectors, such as astro-tourism. The failure to consider these factors results in an evident gap in the overall landscape and environmental assessment.

More alarmingly, there has been no evaluation regarding the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can lead to disorientation and increased collision risks. The application lacks any lighting impact assessment or phototaxis study, failing to evaluate how aviation lighting might affect these species or potentially increase mortality rates.

This issue is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which neglects to account for nocturnal activity and related risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, a risk that has yet to be assessed. The absence of site-specific night-time data creates a crucial deficit in understanding the ecological impacts.

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

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

Collectively, the absence of assessments concerning dark skies and nocturnal wildlife represents a substantial evidential gap. The lack of baseline data, impact modelling, and species-specific analysis leaves the application incomplete and unable to support a lawful determination.

## **SUMMARY**

The Spiorad na Mara Offshore Wind Farm proposal highlights significant shortcomings in its adherence to sustainable development principles when evaluated against statutory duties, national policies, and evidential standards. This application echoes the fundamental issues that resulted in the 2008 rejection of the Lewis Wind Power proposal, where the extent of industrialisation was deemed unacceptable. It is now being presented under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing even more strongly.

Critical gaps exist in the evidence provided for consideration. The use of an undefined design envelope, unspecified reliance on mitigation measures, and the absence of crucial impact pathways, including those related to nocturnal wildlife, complete onshore infrastructure, and tourism effects, undermine the application. As a result, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of significant effects or residual impacts.

The proposal also suffers from procedural inadequacies. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the incomplete Social Impact Assessment is a notable omission. Such deficiencies obstruct the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

In addition, the proposal contravenes National Planning Framework 4. It does not adequately protect biodiversity, natural landscapes, or cultural heritage, fails to demonstrate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit due to absent tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been properly evaluated, complicating the assessment of their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain unclear and potentially severe. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also contain internal inconsistencies. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and precluding a lawful determination that impacts are acceptable.

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

In summary, the application presents both procedural and substantive issues that render it unfit for determination. The combination of significant information gaps, policy discrepancies, and unresolved environmental risks precludes a lawful, evidence-based decision. Therefore, it is urged that consent for the Spiorad na Mara Offshore Wind Farm application be refused in its entirety.

**Yours faithfully,**

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: E62B5BF2

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

**Dear Sir/Madam**

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm. The application has been submitted under the applicable marine licensing and Environmental Impact Assessment regimes. This objection arises from an examination of the Environmental Impact Assessment Report and its associated documents, which reveal significant deficiencies in planning, environmental assessment, cultural considerations, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns have been raised regarding the scale, proximity, and design of the proposal, which challenge its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful decision-making process. Essential environmental data is absent, the baseline information provided is both limited and inconsistent, and crucial elements of the proposal remain unclear. The flexible design framework used within the application inhibits a comprehensive assessment of potential significant effects, while the reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the documentation fails to facilitate a thorough understanding of the environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects lack robust supporting evidence.

There exist substantive conflicts with established policies. The proposal is inconsistent 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 aimed at safeguarding biodiversity, climate considerations, and environmental integrity. Such conflicts directly affect the statutory tests required for consent, thereby compromising the competent authority's ability to conclude that the development adheres to policy standards.

The scale of the proposed development is unprecedented for this area, with large turbines positioned in close proximity to the shoreline, raising substantial concerns regarding landscape capacity, visual dominance, and environmental ramifications. Collectively, the lack of adequate information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and incapable of sustaining a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

## **ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The application is fundamentally flawed as it relies on an incomplete Environmental Impact Assessment Report that lacks transparency and reliability regarding the expected environmental effects of the proposed development. A flexible Project Design Envelope is used, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hampers the consistent application of a worst-case scenario. As a result, the assessment's integrity is compromised, and the impacts outlined may not accurately represent the development that is ultimately built. This situation inhibits both the public and the competent authority from gaining a true understanding of the environmental implications.

Furthermore, the application is built on an over-reliance on mitigation measures, monitoring strategies, and management plans that have yet to be clearly defined. As a result, consent is sought based on the premise that environmental harm will be addressed in the future, which thwarts any meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. This postponement of crucial information until after consent has been granted is procedurally unacceptable and runs contrary to the aims of the Environmental Impact Assessment regime, which stipulates that significant effects and mitigation must be clearly established before any determination can take place.

The report exhibits notable evidential deficiencies, with significant gaps in baseline data and limitations in methodology. It relies on assumptions rather than site-specific evidence, leading to uncertainty regarding the magnitude and significance of impacts. This is particularly concerning where conclusions of negligible or non-significant effects are claimed without robust supporting data. The lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that does not align with statutory requirements.

Consequently, the application fails to meet the evidential standard set by the Habitats Regulations to discount adverse effects beyond reasonable scientific doubt. The precautionary principle must be invoked here, especially concerning protected species and sensitive habitats. Additionally, the proposal does not comply with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report not only unreliable but also incomplete. These shortcomings hinder a lawful and comprehensive evaluation of environmental effects and leave the competent authority unable to make an informed decision based on the information provided.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The West Lewis coastal environment is characterised by its high sensitivity and biological activity, yet the assessment of marine ecology and protected species is fundamentally flawed. The baseline data provided is incomplete, and the methodologies employed do not adequately capture the presence, behaviour, or habitat use of important species. This lack of thoroughness results in an assessment that fails to offer a sound evidential basis for evaluating potential impacts.

A significant gap in the assessment involves otters, which are classified as a European Protected Species. The application does not adequately recognise or assess the active use of coastal areas by otters for foraging and movement. The oversight of their core foraging range and behavioural patterns means the potential effects of construction disturbances, including noise and increased activity, have not been properly evaluated. This failure undermines any conclusions drawn about the absence of significant effects on the species.

Additional shortcomings are evident in the assessment of basking sharks, where the dependence on aerial surveys introduces a substantial detection bias, particularly under Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate frequent usage of these waters. The neglect to incorporate or adequately consider such data results in a deficient baseline, ultimately undermining the reliability of the conclusions reached.

These methodological inadequacies lead to conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. Moreover, the lack of sufficient baseline data hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation generates uncertainty concerning the actual scale 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, as there has been an inadequate identification and assessment of protected species. The uncertainty introduced by these shortcomings prevents any exclusion of adverse effects beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. In light of this, consent cannot be lawfully granted.

Overall, the presence of incomplete baseline data, flawed methodologies, and unsupported conclusions makes the assessment unreliable. These deficiencies hinder a robust evaluation of the impacts on marine ecology and protected species and lead to the overarching conclusion that the application lacks a sufficient 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 evaluation of community identity and cultural heritage is markedly insufficient and overlooks the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply interwoven. This application adopts a simplistic view, treating heritage merely as a collection of static,

isolated features, rather than recognising their vital ongoing social, cultural, and spiritual relevance to the community.

A significant concern arises from the handling of culturally important sites, notably the cemeteries at Dalmore, Bragar, and Barvas. These locations are active spaces for burial and spiritual practice, yet they are relegated to static classifications. This mischaracterisation neglects their continued usage, the meaning they hold for the community, and the potential impacts of development on their surroundings. Consequently, this leads to an incomplete assessment of cultural ramifications and dismisses their integral role within the lives of community members.

Moreover, the application fails to take into account intangible cultural heritage, such as the Gaelic language and local traditions, as well as the enduring connection between the community and the coastal environment. These aspects are essential to the area's identity, yet they are glaringly absent from the assessment, highlighting a substantial oversight. The neglect of these factors severely hampers the ability to fully grasp the cultural implications of the proposed development.

Concerns also arise regarding the rights of the community and their engagement in the process. The Gaelic-speaking population has a unique cultural identity, characterised by attributes of an Indigenous People, yet there has been no effort to secure Free, Prior and Informed Consent. This lack of genuine engagement calls into question the validity of the assessment and fails to align with recognised principles of participation in decisions that affect cultural and environmental interests.

Additionally, there is a critical procedural lapse in the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this crucial assessment, the relevant authorities cannot meet their legal obligations to consider the social, cultural, and economic effects on the island community. This failure in itself renders any determination made on the application unlawful.

From a policy standpoint, these shortcomings place the proposal in direct contradiction to National Planning Framework 4, particularly regarding the safeguarding of historic sites and cultural places. The oversight in recognising both tangible and intangible heritage, alongside the neglect of living cultural practices, constitutes a clear deviation from policy expectations.

In summary, the cumulative failure to assess living heritage, intangible cultural values, community rights, and statutory requirements leads to a substantial evidential void. The cultural consequences of the proposed development have not been appropriately examined, and the application lacks a solid foundation for understanding the genuine cultural costs involved.

## **FISHERIES AND MARINE LIFE**

The application poses serious concerns regarding the assessment of marine life and fisheries, which appears fundamentally inadequate. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry. However, the application does not convincingly demonstrate how these critical uses and habitats can be protected against significant disruption.

A troubling aspect of the proposal is the assumption that fishing activities can be relocated without any repercussions. There is no evidence provided to confirm that alternative fishing grounds exist or that they would be accessible and capable of handling increased pressure. This is a significant omission, as forcing fishing displacement could lead to overfishing in other areas, ultimately threatening the livelihoods of the local fishing fleet. Without a thorough and evidence-based assessment, understanding the true impacts on fisheries and the communities dependent on them is impossible.

Moreover, the proposal presents considerable risks to marine species, particularly due to underwater noise from construction activities. The prolonged use of high-energy hammer piling is expected to create disturbances that could affect marine life over extensive areas, including the local population of bottlenose dolphins. The application seems to downplay the predicted effects on these dolphins, despite the serious nature of the threat, lacking adequate evidence to support such minimisation.

There is a troubling inconsistency within the application regarding the need for licences for any harm to European Protected Species. While it acknowledges the requirement for such permits, it simultaneously describes these impacts as negligible. This contradiction seriously undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Additionally, the assessment does not adequately address the cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these interrelated effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic conditions tied to them.

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

In conclusion, the combination of insufficient evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the application render the assessment incomplete and unreliable. These shortcomings significantly hinder a comprehensive evaluation of the impacts on marine life and fisheries.

## **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 known for its exceptionally dark skies, which are essential for environmental quality, cultural identity, and tourism. The proposal includes permanent red aviation lighting that will be visible over long distances, creating a continuous and intrusive wall of light effect across the western horizon. This will fundamentally change the night-time environment.

The application fails to evaluate how this lighting will impact visual amenity, landscape character, or the experiences of both residents and visitors. Given the importance of dark skies to the area's identity and the growing sector of astro-tourism, this omission is critical. Not considering these impacts results in a substantial gap in the overall landscape and environmental assessment.

More concerning is the lack of evaluation regarding the effects on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are sensitive to artificial lighting due to phototaxis, which can disorient them and increase the risk of collision. There is no lighting impact assessment or phototaxis study included in the application, meaning that the potential effects of aviation lighting on these species or mortality rates have not been assessed.

This issue is exacerbated by the dependence on daytime survey data in the ornithological assessment, which does not account for nocturnal activities or the 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 evaluated. The lack of site-specific night-time data creates a critical void in understanding the ecological impacts.

Without an 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 cannot be satisfied. This invokes the precautionary principle and hampers the ability to make a lawful determination.

From a policy standpoint, this omission is at odds with National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, it undermines the broader evaluation of landscape and seascape impacts, as the character of the night-time environment is a vital component of the overall setting.

Overall, the lack of assessment concerning dark skies and nocturnal wildlife leads to a significant evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis make the application incomplete and unable to support a lawful determination.

## **SUMMARY**

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as defined by statutory duties and national policy. It echoes the issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new application is positioned under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still falls short.

A significant concern is the absence of a comprehensive and reliable evidential basis for the application's determination. Critical gaps exist in baseline data, and the continued reference to an undefined design envelope raises questions. Mitigation measures mentioned are not specified, and important impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism, have been overlooked. Consequently, the Environmental Impact Assessment remains incomplete, hindering an understanding of potential significant effects and residual impacts.

The procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the non-disclosure of the complete Social Impact Assessment is a material omission that inhibits the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These failures collectively render the application unsuitable for determination.

Additionally, the proposal contradicts the National Planning Framework 4 by failing to demonstrate adequate protection of biodiversity, natural landscapes, and cultural heritage. It does not provide evidence that health and wellbeing impacts are acceptable, nor does it demonstrate a net economic benefit due to the lack of tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring their implications for peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and obstructing a lawful determination that impacts are acceptable.

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

In summary, the application is procedurally and substantively unfit for determination. The scale of information deficiencies, alongside policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. Therefore, the

competent authority should refuse consent based on these grounds or employ the relevant regulatory measures to demand the submission of the necessary information.

Thus, 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: 9D6751C8

**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. Our concerns stem from a thorough review of the Environmental Impact Assessment Report and supporting documentation, revealing significant deficiencies related to planning, environmental considerations, cultural aspects, and procedural integrity. The development site is situated off the west side of the Isle of Lewis, known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The design, scale, and proximity of the proposal raise profound questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis for lawful determination. Important environmental data is absent, baseline information is limited and inconsistent, and essential elements of the proposal remain undefined. The flexible design framework used inhibits a clear assessment of likely significant effects, while reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the documentation does not allow for a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

Moreover, there are evident and substantial policy conflicts. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate that national obligations to safeguard biodiversity, climate interests, and environmental integrity can be fulfilled. These conflicts are directly related to the statutory tests required for consent and compromise the competent authority's ability to determine the development's acceptability in policy terms.

The unprecedented scale of this proposal, with large turbines positioned near the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear non-compliance with policy underscores the application's incompleteness, rendering it incapable of supporting a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, transparent, or dependable overview of the potential environmental impacts of the proposal. The reliance on a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations, introduces substantial uncertainty. This uncertainty hampers the ability to consistently apply a worst-case scenario, thereby jeopardising the assessment's integrity. As a result, the presented impacts may not accurately reflect the actual development, leaving both the public and the competent authority unable to grasp the true scale of environmental effects.

Furthermore, the application leans heavily on unestablished mitigation measures, monitoring strategies, and management plans. Seeking consent on the premise that any environmental harm will be mitigated later obstructs a meaningful evaluation of effectiveness or residual impacts. This postponement of crucial information to post-consent phases is procedurally unacceptable and contradicts the intended function of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies be clearly identified before any determination is made.

Evidential shortcomings are also apparent, encompassing gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such deficiencies result in uncertainty regarding the magnitude and significance of impacts, especially where claims of negligible or non-significant effects are presented without adequate supporting data. The lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that conflicts with statutory obligations.

Consequently, the application does not satisfy the evidential requirements outlined in the Habitats Regulations, which necessitate the exclusion of adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially in relation to protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, including obligations for biodiversity protection and environmental integrity, as it remains unproven that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, lack of specified mitigation, and gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These flaws inhibit a lawful and rigorous assessment of environmental effects, meaning the competent authority cannot adequately assess the application based on the information supplied.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The assessment related to marine ecology and protected species is fundamentally flawed and fails to provide a thorough and trustworthy understanding of the ecological receptors present in the West Lewis coastal environment. This marine system is not only biologically active but also highly sensitive, yet the baseline data remains

incomplete, and the methodologies utilised do not adequately capture the presence, behaviour, and habitat use of the species. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

A significant oversight in this application pertains to otters, which are designated as a European Protected Species. There has been inadequate recognition and assessment of their active foraging and movement within the coastal areas. The failure to consider their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity have not been sufficiently examined. This shortcoming undermines any conclusions drawn regarding the absence of significant effects on this species.

Furthermore, the evaluation of basking sharks is deficient, as it relies heavily on aerial surveys that introduce considerable 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 which demonstrate their frequent use of these waters. The omission of relevant data leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings imply that any conclusions drawn regarding negligible or non-significant effects rest on assumptions rather than on strong evidence. The lack of adequate baseline data also obstructs a meaningful evaluation of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set by the Environmental Impact Assessment regime and the National Planning Framework 4, as it has not properly identified or assessed protected species. The degree of uncertainty created precludes the ability to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, it is not lawful to grant consent.

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

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The assessment provided in the application demonstrates significant deficiencies, ultimately leading to an unreliable conclusion regarding its environmental impact. A critical area of concern is the presence of contradictory findings within the application itself. While the developer asserts that there will be no significant adverse effects, they simultaneously put forward a Habitats Regulations derogation case, which should only arise in situations where significant harm is anticipated. This inconsistency raises

serious doubts about the validity of the assessment and suggests that the findings do not have a solid evidential foundation.

Additionally, the ornithological assessment contains major gaps in evidence, particularly in relation to the seabird populations that inhabit the west coast of the Isle of Lewis. This area is home to internationally important seabird species, many of which are already in decline. The application fails to convincingly demonstrate that these species will remain unaffected, particularly concerning the key foraging areas and migratory pathways where the development is sited. The implications of potential displacement, collision risk, and habitat loss have not been adequately evaluated.

Moreover, the assessment does not sufficiently account for the significance of feeding grounds associated with protected sites, such as the Lewis Peatlands and St Kilda. The methodologies used in the assessment are likely to underestimate the potential for mortality among species like Kittiwakes and Fulmars, especially given the lack of complete baseline data and a thorough understanding of their behavioural responses.

The siting of turbines within a recognised migratory corridor presents an additional risk, effectively forming a barrier within a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor have not been adequately assessed, nor have the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and the limitations of the modelling employed means that the standard of beyond reasonable scientific doubt has not been met. This situation necessitates engagement with the precautionary principle, undermining the validity of any conclusions drawn in support of the proposal.

Additionally, the deficiencies identified represent a failure to comply with National Planning Framework 4, particularly regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected places the application in direct conflict with national policy.

In summary, the assessment's internal inconsistencies, methodological weaknesses, and insufficient evidence collectively hinder a thorough evaluation of the potential impacts. Consequently, the application does not fulfil the statutory requirements necessary for proper determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The West Lewis coastline is a vibrant cultural landscape where the environment, language, traditions, and community are intricately linked. However, the assessment of cultural heritage and community identity is fundamentally inadequate. It adopts a reductive approach, treating heritage merely as a collection of 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 mischaracterised as static features, despite being active places of burial and spiritual practice. This oversight neglects their continued use and meaning, as well as the potential impact of development on their settings. Consequently, the cultural effects have not been adequately evaluated, disregarding the essential role these sites play in community life.

The assessment also overlooks intangible cultural heritage, including the Gaelic language and traditions that are essential to the area's identity. This omission represents a significant failure, as these elements are vital for understanding the full cultural impact of the proposed development.

Moreover, there are serious concerns regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity, recognised as characteristics of an Indigenous People. Yet, no Free, Prior and Informed Consent process has been implemented. This lack of meaningful engagement undermines the validity of the assessment and fails to align with established principles of participation in decisions that affect cultural and environmental interests.

Another critical issue is the absence of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. The lack 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 alone undermines the lawful determination of the proposal.

From a policy standpoint, these deficiencies contradict National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to account for both tangible and intangible heritage, along with the lack of recognition of living cultural practices, represents a clear departure from policy obligations.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and compliance with statutory requirements results in a significant evidential gap. The cultural impacts of the development remain improperly evaluated, leaving the application without a sufficient basis for understanding the true cultural cost of the proposal.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The proposal lacks a complete assessment of social impacts, health, and wellbeing. The developer commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report has not been published. This omission creates a significant gap in evidence and hinders both public understanding and the competent authority's ability to grasp the full extent of social risks identified in the developer's research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts come from direct engagement with the community and are not speculative. Nonetheless, the failure to disclose the complete assessment restricts proper scrutiny of these findings and limits the determination of their significance in the decision-making process.

Moreover, the proposal is seen as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, these effects have not been adequately incorporated into the main application, nor have they been given appropriate weight. The withholding of the full Social Impact Assessment obscures the real human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, especially where community character and functioning may be affected. By not providing the complete dataset, the application fails to offer a robust evidential basis to evaluate the balance between benefits and harms.

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

The procedural implications are substantial. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This constitutes a material omission within the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, paired with evidence of existing negative impacts, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and supports the conclusion that the application does not possess sufficient information.

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The West Lewis coastline is characterised by its open Atlantic horizon and a strong sense of remoteness, which is essential to its undeveloped character. The proposal for large-scale turbines in close proximity to the shoreline would result in a continuous industrial presence that would fundamentally change this character, leading to a permanent and irreversible transformation of the landscape.

The magnitude of visual change associated with this application is inadequately represented. 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 fails to convey the significance of this impact within such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints in the assessment. Evidence indicates that these viewpoints may not fully capture the sensitivity of key cultural heritage sites or the worst-case scenarios, particularly concerning high-value landscapes. This raises the risk of underestimating the magnitude of visual impact, which undermines the reliability of the assessment.

Furthermore, there is a notable deficiency in assessing the interconnectedness of landscape, seascape, and cultural heritage. Significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a wider landscape context linked to the Atlantic horizon. The assessment treats these heritage assets in isolation rather than recognising their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever these vital connections, disrupting how heritage assets are experienced in relation to the natural horizon. This represents not only a significant visual impact but also broader cultural and spatial harm that has not been adequately assessed.

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

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

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

## **CONSTRUCTION AND POLLUTION RISKS**

The proposed works involve significant seabed preparation and installation activities in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete, lacking the necessary detail to evaluate potential environmental effects adequately. There are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that are to be

developed after consent is granted, which hampers any meaningful assessment of their adequacy or effectiveness.

This reliance on unspecified future measures is particularly alarming due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. While the application acknowledges risks associated with sediment mobilisation and potential chemical or oil spills, it does not provide sufficient detail on the methods for prevention, control, or monitoring of such incidents.

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

The lack of detailed emergency response procedures exacerbates these issues. By deferring contingency planning to a post-consent phase, the application fails to allow for a proper evaluation of whether adequate safeguards are in place to respond to pollution events. This introduces procedural risks and undermines the ability of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements set out by the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation measures are evaluated prior to consent, and in the absence of such information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

Overall, the combination of undefined mitigation measures, insufficiently detailed management plans, and uncertainty regarding potential impacts renders the assessment materially deficient. These shortcomings obstruct a thorough evaluation of construction and pollution risks and further indicate that the application is incomplete.

## **FISHERIES AND MARINE LIFE**

The proposal raises significant concerns regarding the assessment of fisheries and marine life, which lacks a thorough evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast, known for their diverse marine ecosystem and active fishing industry, face potential threats from the proposed development. The application fails to ensure that these habitats and livelihoods will be protected or maintained without considerable disruption.

One major issue is the underlying assumption that fishing activities can be displaced without any repercussions. The application does not provide evidence that alternative

fishing grounds are available or can adequately accommodate the displaced activity. This gap is critical, as such displacement could lead to overfishing in other areas and have broader economic ramifications for the local fishing fleet. The absence of a clear, evidence-based assessment makes it impossible to understand the true impacts on fisheries and local livelihoods.

Moreover, the proposal poses serious risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over a prolonged period is expected to disturb marine life over extensive distances, notably affecting species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming; however, the application downplays these effects without adequate evidence to support such minimisation.

There is an evident inconsistency in the application, where the necessity for licences to permit harm to European Protected Species is acknowledged, while simultaneously declaring the impacts as negligible. This contradiction compromises the credibility of the assessment and raises questions about compliance with the Habitats Regulations, particularly concerning anticipated harm that would necessitate legal authorisation.

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

From a policy perspective, the application does not demonstrate adherence to 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 hinders any conclusion that the proposal signifies sustainable development.

Overall, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies culminate in an assessment that is incomplete and unreliable. These shortcomings obstruct a robust evaluation of the impacts on marine life and fisheries.

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The proposed project encompasses both offshore turbines and onshore infrastructure, yet the assessment of onshore elements is significantly incomplete. This fragmentation results in a failure to understand the full range of environmental and socio-economic impacts associated with what is fundamentally a single integrated project. Onshore works include the installation of cabling across protected moorland and the construction of a substation near Stornoway, alongside associated access infrastructure that traverses sensitive landscapes.

Critical to this proposal is the excavation that will occur across areas of deep peat,

particularly within Barvas Moor, a vital carbon store and ecologically sensitive habitat. The application does not adequately assess these impacts, thus preventing a thorough understanding of the overall environmental footprint of the project. The separate evaluations of offshore and onshore components mean that cumulative effects on peatlands, habitats, and local communities remain inadequately addressed.

Furthermore, significant risks to sensitive habitats exist, including machair systems and peatland environments, both of which are subject to specific policy protections. The application lacks demonstration of a full assessment of impacts on these habitats or the implementation of appropriate avoidance measures, resulting in a notable evidential gap in biodiversity protection.

The proposal also presents concerns surrounding carbon balance. Disturbance of peatland can release stored carbon, leading to a potential carbon debt that contradicts the goals of renewable energy development. The application fails to sufficiently address this critical issue or to show that the overall carbon balance will be maintained as beneficial.

Additionally, routing infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. There is no evidence presented that demonstrates the initiation of necessary consents or processes, which raises doubts regarding the deliverability and lawful execution of the project.

From a policy standpoint, the inability to assess the project as a cohesive whole and to show adequate protection of 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 validity of the application.

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

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The West Lewis coastline is noted for its exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism value. The proposal to introduce 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 Environmental Impact Assessment fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. Such omissions are significant, particularly given the growing importance of dark skies to the region's identity and emerging sectors like astro-tourism. The lack of consideration for these impacts leads to a notable gap in the overall landscape and

environmental assessment.

Additionally, the application does not assess the potential effects of this lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. There is no lighting impact assessment or phototaxis study included in the application, leaving unaddressed how aviation lighting may affect these species or contribute to increased mortality rates.

The reliance on daytime survey data in the ornithological assessment further complicates matters, as it fails to capture nocturnal activity or associated risks. Kittiwakes, which may forage or migrate during the night, are similarly vulnerable to disorientation caused by artificial lighting, yet this risk remains unexamined. Without site-specific night-time data, understanding the ecological impacts becomes severely limited.

The absence of any evaluation of nocturnal impacts prevents a clear determination of whether protected species or designated sites would face adverse effects. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering 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 the comprehensive assessment of landscape and seascape impacts, as night-time character is an essential aspect of the environment.

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

## **TOURISM**

The Isle of Lewis has seen tourism grow considerably, with its economic value increasing from £65 million in 2017 to over £81.5 million, creating more than 1,000 jobs and representing up to 16% of the island's economy. However, the application fails to model how large-scale offshore infrastructure could impact this vital sector. It acknowledges that 86% of visitors are attracted by the natural scenery, yet does not provide a quantified assessment of how such industrialisation might affect visitor numbers, behaviour, or the overall economic contribution of tourism.

In addition, the assessment overlooks the essential role that environmental quality plays in supporting tourism. The significance of the area's unspoiled landscapes and dark skies is critical to the visitor experience, especially in emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this oversight, resulting in a notable gap in understanding how the

proposed development might affect these aspects of the local economy.

Given the limited economic diversification within the island community, the lack of a comprehensive assessment of tourism impacts carries wider implications for local employment, businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been thoroughly evaluated, as required by the Islands (Scotland) Act 2018. Furthermore, from a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly regarding economic impact and the necessity to show net benefit. It also fails to align with strategic objectives that prioritise tourism as a growth sector and does not provide adequate evidence for the competent authority to assess the economic consequences of the proposal.

Collectively, the failure to quantify tourism impacts, evaluate the environmental factors influencing visitor behaviour, and recognise the island's economic reliance leads to a significant evidential gap. This hampers a robust evaluation of the economic effects, ultimately suggesting that the application is incomplete.

## SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the criteria for sustainable development as required by statutory duties and national policy. It mirrors the critical issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the level of industrialisation. This new application, presented under a more robust policy framework, still falls short, particularly in areas concerning biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis for the proposal is incomplete and unreliable. There are substantial gaps in baseline data, the design envelope remains undefined, and there is an over-reliance on unspecified mitigation measures. Furthermore, vital impact pathways have been omitted, such as those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is not comprehensive and fails to provide a clear understanding of the likely significant effects or residual impacts.

Procedural shortcomings are evident, notably the lack of a compliant Island Communities Impact Assessment, which contravenes statutory obligations under the Islands (Scotland) Act 2018. Additionally, the omission of the complete Social Impact Assessment is a serious gap that hinders the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

The proposal also contradicts National Planning Framework 4, as it does not adequately demonstrate protection for biodiversity, natural environments, and cultural heritage. Furthermore, it fails to show that health and wellbeing impacts are acceptable

and does not provide evidence of a net economic benefit, particularly due to the lack of tourism impact analysis. The assessment of cumulative impacts from both offshore and onshore components is insufficient, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks persist, with incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The combination of informational deficiencies, policy inconsistencies, and unresolved environmental risks makes it impossible to arrive at a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuses consent based on these grounds or utilises the appropriate regulatory measures to compel the submission of the missing information.

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

### **Additional Comments**

This area is valued for its “wild,” rural landscape, and turbines (which can exceed 150–200m in height) will dominate skylines and alter long-distance views in a negative way. The site landscape is closely tied to Scottish identity, history, and archaeology. The development will be controversial - impacting near historic sites and or culturally significant vistas the community feels should remain unchanged. Building these turbines on this remote area requires roads, foundations, and grid connections. This means cutting tracks through previously untouched land, altering drainage patterns, and increasing traffic during construction. We have enough wind turbines on Scottish landscape, we don't need to ruin them all.

**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: A3F80132

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

**Dear Sir/Madam**

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The scale of the proposal is unprecedented in this location, with large turbines positioned in close proximity to the shoreline. This introduces significant concerns regarding landscape capacity, visual dominance, and environmental impact.

The application does not provide an adequate evidential basis for a lawful determination. Critical environmental data is missing, baseline information is limited and inconsistent, and key aspects of the proposal remain undefined. The use of a flexible design framework prevents a clear understanding of likely significant effects, while the reliance on mitigation measures that have not yet been specified means their effectiveness cannot be assessed. Consequently, the documentation does not enable a full or informed understanding of environmental, cultural, or community impacts. Claims of negligible or non-significant effects are not supported by robust evidence.

There are clear and substantive conflicts with policy. The proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly evident concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate that national requirements to protect biodiversity, climate interests, and environmental integrity can be met. Such conflicts directly affect the statutory tests required for consent and undermine the ability of the competent authority to conclude that the development is acceptable in policy terms.

Given the absence of sufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete and incapable of supporting a lawful determination. In these circumstances, the precautionary principle must apply. The development is located off the west side of the Isle of Lewis, an area defined by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The concerns raised regarding the compatibility of the proposal with statutory requirements, national policy, and the principles of sustainable development are fundamental.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report is fundamentally lacking and does not deliver a comprehensive, transparent, or dependable evaluation of the potential environmental effects associated with the proposal. The employment of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions,

layouts, or configurations, introduces considerable uncertainty. This uncertainty hinders the consistent application of a worst-case scenario, which compromises the integrity of the assessment. As a result, the impacts outlined may not accurately reflect the development that will ultimately be constructed, leaving both the public and the competent authority unable to grasp the true extent of the environmental consequences.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have yet to be clearly defined. Consequently, consent is sought on the premise that any environmental harm will be addressed at a later date. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the core objectives of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation strategies are clearly established before any determination.

There are also substantial evidential shortcomings, which include gaps in baseline data, methodological limitations, and a dependency on assumptions rather than site-specific evidence. This results in uncertainty regarding the scale and significance of impacts, particularly where conclusions asserting 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 and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not meet the evidential standards required under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes obligations related to 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 measures, and gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies hinder a lawful and thorough evaluation of environmental effects, leaving the competent authority without the necessary information to make an informed determination on the application.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The evaluation of marine ecology and protected species is significantly lacking, providing neither a complete nor a reliable understanding of ecological receptors within the West Lewis coastal environment. This area is highly sensitive and biologically active, yet the baseline data is inadequate, and the methodologies employed do not sufficiently capture species presence, behaviour, and habitat utilisation. Consequently, this assessment does not deliver a sound evidential basis for assessing potential impacts.

A notable shortcoming is the assessment of otters, a European Protected Species. The application fails to properly acknowledge and evaluate their active use of coastal zones for foraging and movement. The oversight of their core foraging range and behavioural patterns results in a failure to adequately assess the potential effects of construction disturbances, noise, and increased activity. This oversight undermines any conclusions regarding the absence of significant effects on the species.

Further concerns are raised regarding the assessment of basking sharks. The reliance on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions, which may lead to an underestimation of their presence. This is especially evident when compared to established land-based observations indicating frequent use of these waters. The omission of such critical data results in an incomplete baseline and further weakens the reliability of the conclusions drawn.

The methodological flaws highlighted mean that assertions of negligible or non-significant effects rely on assumptions rather than strong evidence. Additionally, the lack of adequate baseline data hampers meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty obscures the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out by the Environmental Impact Assessment regime and the National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty involved prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

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

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The assessment of the application raises significant concerns regarding its reliability due to internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. It fails to demonstrate, to the required evidential standard, that internationally important seabird populations, many of which are already in decline, will not be adversely affected. The west coast of the Isle of Lewis supports these critical seabird populations, and the development is situated within key foraging areas and migratory pathways. However, the implications of displacement, collision risk, and habitat loss are not adequately evaluated.

There is a fundamental contradiction in the application, where the developer concludes no significant adverse effects while also advancing a Habitats Regulations derogation

case, which is only warranted where significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not adequately backed by the supporting evidence.

The assessment neglects to provide 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 leads to uncertainty, particularly for species experiencing severe declines, like Kittiwakes and Fulmars. Methodologies employed are likely to underestimate mortality, especially given incomplete baseline data and incomplete understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor introduces additional risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate 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 meet the evidential threshold required to conclude no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle and prevents a lawful conclusion in favour of consent.

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

In conclusion, the assessment is ultimately unreliable due to its internal contradictions, methodological flaws, and insufficient evidence, all of which hinder a thorough evaluation of impacts and contribute to the overall determination that the application does not satisfy the statutory requirements necessary for approval.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

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

A major shortcoming is the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations for burial

and spiritual practices, yet they are mischaracterised as mere static features. This oversight neglects their continuing use and meaning, as well as the impact that development may have on their surroundings. Such misrepresentation leads to an incomplete assessment of cultural implications and overlooks their integral role in community life.

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

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

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

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

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

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The lack of transparency surrounding the Social Impact Assessment is a critical concern that undermines the integrity of the entire evaluation process. The developer has conducted a Social Impact Assessment, which included focus groups with local residents, but the comprehensive report remains unpublished. This significant gap in evidence restricts both public understanding and the ability of the competent authority to grasp the complete range of social risks identified in the developer's own research.

Residents are reportedly experiencing considerable stress, anxiety, and concern due to

the scale and proximity of the proposed development. These impacts are based on direct engagement and are not mere speculation. However, the absence of the full assessment limits the opportunity for thorough examination of these findings, which is essential for informed decision-making.

Moreover, there is growing sentiment that the proposal threatens community identity and cohesion, with findings highlighting "cultural loss." Despite the significance of these impacts, they have not been adequately incorporated into the main application or given the necessary consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This situation has serious implications for the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial, especially for developments of this magnitude that may affect community character. The failure to provide complete data means the application lacks a comprehensive evidential basis for weighing benefits against potential harms.

From a policy standpoint, the application does not comply with National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm, yet the evidence suggests there are existing adverse effects that remain undisclosed. Without access to the full assessment, compliance with this policy is unproven.

The procedural ramifications are significant as well. The competent authority cannot conduct a robust socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a major omission within the application and fails to meet the evidential standards mandated by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, alongside the documented existing adverse impacts, results in an incomplete and unreliable evaluation. This deficiency hampers a lawful determination and reinforces the assertion that the application is not substantiated by adequate information.

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The evaluation of visual, seascape, and landscape impacts is significantly lacking and does not sufficiently address the degree of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, undeveloped nature, and a pronounced sense of remoteness. The proposed installation of large-scale turbines near the shore would create a continuous industrial presence that would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

Moreover, the application fails to adequately portray the extent of this visual change. The scale and proximity of the turbines are such that they would dominate views from

residential areas, historic sites, and popular coastal locations. This would negatively affect visual amenity and diminish the qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of this impact within the context of such a sensitive landscape.

Concerns also exist regarding the methodology used in selecting and presenting visual viewpoints. There is evidence to suggest that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly with respect to key cultural heritage sites and high-value landscapes. Consequently, there is a risk that the true extent of visual impact has been underestimated, which calls into question the credibility of the assessment.

Additionally, the assessment neglects to consider the interconnected relationship between the landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape context that is visually and spatially linked to the Atlantic horizon. Rather than recognising these sites as interdependent, the assessment treats them as isolated entities, resulting in a partial evaluation of their setting and cultural importance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and severing their ties to the natural horizon. This alteration represents not merely a visual impact but a broader cultural and spatial detriment that has not been adequately evaluated within the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly regarding the safeguarding of natural places and historic assets. The scale of change proposed is at odds with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a comprehensive worst-case assessment further undermines claims of compliance with policy.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be both dominant and unavoidable. Thus, the resulting change is fundamentally permanent and cannot be reduced to an acceptable level through mitigation.

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

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The evaluation of the proposed onshore infrastructure is significantly lacking and does not account for the full range of impacts associated with what constitutes a single integrated project. The offshore turbines and the onshore works are interconnected, yet the assessment treats them separately, leading to a disjointed understanding that

obscures the true magnitude of both environmental and socio-economic repercussions.

Onshore components include cabling that traverses protected moorland, the construction of a substation close to Stornoway, and necessary access routes through vulnerable landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, recognised as a crucial carbon store and ecologically sensitive environment. The application fails to deliver a thorough assessment of these impacts, limiting the ability to grasp the overall environmental footprint of the project.

The exclusion or postponement of the assessment for onshore impacts hinders the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively. However, the division between offshore and onshore elements results in an incomplete understanding of the combined effects on peatlands, habitats, and local communities.

Furthermore, there are considerable risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not adequately show that the effects on these habitats have been thoroughly assessed or that effective avoidance measures have been implemented, leaving a distinct gap in evidence concerning biodiversity protection.

Additionally, the routing of infrastructure through operational croft land raises potential conflicts with existing land use and legal rights. The application does not substantiate that the necessary consents or processes have been properly initiated, which casts doubt on the feasibility and lawful execution of the project.

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

In summary, the fragmented treatment of project components, the absence of a comprehensive assessment, and the failure to provide clear evidence regarding environmental and land use impacts render this segment of the application incomplete and unreliable, thereby impeding a lawful determination.

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The absence of an assessment regarding dark skies and nocturnal wildlife is a significant omission within the Environmental Impact Assessment. Dark skies are a crucial aspect of the West Lewis coastline, contributing to environmental quality, cultural identity, and tourism. The proposal introduces permanent red aviation lighting that is visible over extensive distances, creating a continuous "wall of light" effect across the western horizon, which would fundamentally disrupt 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. Given the critical importance of dark skies to the area's identity and the potential development of sectors like astro-tourism, this omission becomes even more significant. Consequently, there exists a notable deficiency in the overall landscape and environmental assessment.

Furthermore, there is a lack of evaluation regarding the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel demonstrate heightened sensitivity to artificial lighting due to phototaxis, which can result in disorientation and increased risk of collision. The absence of any lighting impact assessment or phototaxis study fails to address how aviation lighting may affect these species or contribute to increased mortality rates.

This lack of thorough evaluation is exacerbated by the dependence on daytime survey data within the ornithological assessment, which does not adequately capture nocturnal activity or related risks. Additionally, species like Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation due to artificial lighting, yet this has not been assessed. The failure to gather site-specific night-time data leaves a critical void in understanding ecological impacts.

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

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

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

## **SUMMARY**

The Spiorad na Mara Offshore Wind Farm proposal embodies a significant failure to meet the standards of sustainable development as defined by statutory duties, national policy, and evidential criteria. This application revives the same core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. Now, it is being presented within a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and the wellbeing of the community.

There are serious shortcomings in the evidential basis for this proposal. It lacks complete and reliable baseline data, employs an undefined design envelope, relies on unspecified mitigation measures, and overlooks crucial impact pathways, such as those affecting nocturnal wildlife, the full extent of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

The proposal also demonstrates clear procedural shortcomings. The lack of a compliant Island Communities Impact Assessment is a violation of statutory duty as outlined in the Islands (Scotland) Act 2018, and the omission of the full Social Impact Assessment is a significant gap. These failures impede the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

In addition, the proposal stands in direct opposition to National Planning Framework 4. It does not adequately protect biodiversity, natural places, or cultural heritage, fails to demonstrate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit due to insufficient tourism impact modelling. The cumulative effects of offshore and onshore components have not been thoroughly assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and could be significant. Evaluations concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also, in some instances, inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the invocation of the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is unfit for determination both procedurally and substantively. The multitude of information deficiencies, paired with policy conflicts and unresolved environmental risks, obstruct the ability to arrive at a lawful, evidence-based decision. The competent authority must either refuse consent based on these grounds or invoke the relevant regulatory provisions to mandate the submission of the missing information.

Thus, 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: C872FE4A

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

**Dear Sir/Madam**

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. This objection arises from a thorough review of the Environmental Impact Assessment Report and supporting documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns have been raised regarding the proposal's compatibility with statutory requirements, national policy, and the principles of sustainable development, particularly given its scale, proximity to the shoreline, and design.

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

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

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

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report is lacking in essential information and does not offer a complete, clear, or trustworthy account of the potential environmental impacts of the proposal. The proposal's use of a flexible Project Design Envelope, which lacks commitment to specific turbine sizes, layouts, or configurations, creates considerable uncertainty. This approach hinders a consistent worst-case scenario analysis, compromising the assessment's integrity and obscuring the true environmental effects from both the public and the competent authority.

The application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined. Consequently, consent is sought under the premise that environmental damage will be addressed later, which hinders meaningful evaluation of effectiveness or the assessment of residual impacts. Deferring critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment process, which mandates that likely significant effects and mitigation strategies be clearly established before any determination.

There are notable evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting evidence. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts, contributing to scientific uncertainty that cannot be aligned with statutory obligations.

As a result, the application does not satisfy the evidential requirements under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This brings the precautionary principle into play, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, including requirements for biodiversity protection and environmental integrity, as it has not been shown that impacts have been fully assessed or that suitable safeguards are established.

Overall, the dependence on an undefined design envelope, the absence of specific mitigation measures, and gaps in baseline data lead to an unreliable and incomplete Environmental Impact Assessment Report. These shortcomings prevent a lawful and robust evaluation of environmental effects and leave the competent authority unable to make an informed decision based on the provided information.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The assessment regarding marine ecology and protected species is fundamentally flawed and fails to provide a comprehensive understanding of the ecological receptors in the West Lewis coastal environment. This area is a sensitive and biologically vibrant marine system, yet it is evident that the baseline data is lacking, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment does not offer a reliable evidential

foundation for evaluating potential impacts.

A significant oversight is evident in relation to otters, classified as a European Protected Species. The application does not adequately recognise or assess their active use of coastal zones for foraging and movement. This neglect of their core foraging range and behavioural patterns results in an inadequate assessment of how construction disturbances, noise, and increased activity may affect them. Such omissions undermine any conclusions drawn regarding the absence of significant effects on this species.

Deficiencies are also apparent in the evaluation of basking sharks, where the dependence on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions. This method is likely to lead to an underestimation of their presence, especially when juxtaposed with well-established land-based observations that indicate regular use of these waters. The failure to incorporate or adequately consider such data culminates in an incomplete baseline, further diminishing the reliability of the conclusions drawn.

These methodological shortcomings mean that claims of negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of adequate baseline data hampers the meaningful assessment of cumulative and indirect impacts, including variations across seasons and broader ecosystem interactions. As a result, there is uncertainty surrounding the true scale of risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not satisfy the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or assessed. The uncertainty this introduces makes it impossible to exclude 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 unsupported conclusions renders the assessment unreliable. These significant deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, leading to the overarching conclusion that the application lacks 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.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The evaluation of cultural heritage and community identity is severely lacking, particularly in its treatment of the West Lewis coastline as a living cultural landscape. This area, where environment, language, tradition, and community intertwine, is not adequately acknowledged. Instead, the application adopts a narrow perspective, viewing heritage merely as a collection of static assets while overlooking their dynamic social, cultural, and spiritual significance within the community.

Among the key shortcomings is the inadequate 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 reduces them to mere static features. It fails to appreciate their ongoing use and the implications of development on their surroundings. This mischaracterisation leads to an incomplete cultural evaluation and neglects their vital role in community life.

Moreover, the assessment overlooks the importance of intangible cultural heritage, such as the Gaelic language and local traditions, which are essential to the identity of the area. The absence of these elements from the assessment represents a critical gap. Without acknowledging these factors, the true cultural impact of the development remains obscure.

Concerns extend to community rights and engagement, particularly regarding the Gaelic-speaking population, which embodies a distinct cultural identity recognised as Indigenous People. However, there has been no process of Free, Prior and Informed Consent, compromising the credibility of the assessment and failing to adhere to established principles of participation in matters that affect cultural and environmental interests.

A significant procedural failing is the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment impedes the competent authority's ability to legally evaluate the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

From a policy standpoint, these deficiencies position the proposal in direct opposition to National Planning Framework 4, particularly concerning the safeguarding of historic assets and sites. The neglect to consider both tangible and intangible heritage, as well as the living cultural practices, indicates a notable divergence from policy standards.

In summary, the failure to address living heritage, intangible cultural values, community rights, and adherence to statutory obligations results in a significant evidential void. The cultural effects of the proposed development have not been adequately assessed, leaving the application without a robust foundation for understanding the true cultural ramifications.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The assessment of social impacts, health, and wellbeing related to the proposal is insufficient and lacks necessary transparency. While the developer conducted a Social Impact Assessment, including focus groups with local residents, the complete report has not been made public. This results in a significant evidential gap, hindering both public understanding and the competent authority's ability to evaluate the full extent of social risks identified by the developer's research.

Available summaries suggest that residents are already facing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These impacts arise from direct engagement with the community and are not merely speculative. However,

without disclosing the complete assessment, proper scrutiny of the findings is not possible, which limits the capacity to assess their significance in the decision-making process.

Moreover, there is evidence indicating that the proposal threatens community identity and cohesion, with “cultural loss” noted in the developer's findings. Unfortunately, these effects have not been fully considered in the main application or given the appropriate weight they deserve. The decision to withhold the full Social Impact Assessment obscures the actual human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for projects of this magnitude, especially when the character and functioning of the community may be at stake. By failing to provide the complete dataset, the application does not offer a comprehensive evidential basis for weighing the benefits against the potential harms.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and avoid causing harm, but the available evidence reveals adverse effects that have not been fully disclosed. Without the complete assessment, demonstrating compliance with this policy is impossible.

The implications of these procedural shortcomings are serious. The competent authority cannot conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This omission represents a material failure within the application and does not meet the evidential requirements set by the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, alongside evidence of existing adverse effects, renders the assessment inadequate and unreliable. This lack of comprehensive information hinders a lawful determination, reinforcing the conclusion that the application does not rest on sufficient evidence.

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The assessment of visual impacts, seascape, and landscape is significantly inadequate and does not sufficiently account for the scale of change or the sensitivity of the environment. The coastline of West Lewis is characterised by its open Atlantic horizon, undeveloped nature, and a pronounced sense of remoteness. The proposed introduction of large-scale turbines in proximity to the shore would establish a continuous and prominent industrial presence, fundamentally transforming this character and resulting in a permanent and irreversible alteration of the landscape.

Furthermore, the application fails to represent the full extent of the anticipated visual changes. Given the scale and proximity of the turbines, they would dominate views

from residential properties, historical sites, and frequently visited coastal locations. This dominance would directly impact visual amenity and diminish the qualities of naturalness and remoteness that currently define the area. The assessment does not adequately communicate the level of impact or its significance within the context of such a sensitive landscape.

There are also significant methodological issues regarding the selection and depiction of visual viewpoints. Evidence indicates that the chosen viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This inadequacy poses a risk of underestimating the visual impact, thereby compromising the assessment's reliability.

Additionally, a critical shortcoming is the failure to evaluate the interconnected relationship among landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to a broader landscape context, visually and spatially connected to the Atlantic horizon. The assessment treats these significant assets in isolation, disregarding their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal is at odds with National Planning Framework 4 concerning the protection of natural environments and historical assets. The extent of change is incompatible with the necessity to preserve landscape character, visual amenity, and the settings of culturally significant sites. Moreover, the lack of a thorough worst-case assessment further challenges any assertion of policy conformity.

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. Thus, the resulting change is fundamentally significant and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

In summary, the assessment inadequately represents the scale of the impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and affirm the conclusion that the proposal is incompatible with the preservation of this landscape.

## **CONSTRUCTION AND POLLUTION RISKS**

The proposal involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, the assessment of construction and pollution

risks is incomplete, lacking the necessary detail to properly 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 that are to be prepared after consent, which prevents any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is particularly alarming given the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and important habitats that are at risk of sediment disturbance and contamination. The application does acknowledge risks such as sediment mobilisation and potential chemical or oil spills but fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

Moreover, there is uncertainty concerning the scale and behaviour of sediment plumes that may result from the 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 wider assessment.

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

From a regulatory standpoint, the deferment of critical environmental safeguards contradicts the requirements outlined by the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed before consent is granted, and without this information, a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

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

## **FISHERIES AND MARINE LIFE**

The proposal presents significant concerns regarding its assessment of fisheries and marine life, failing to provide a thorough evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the application does not adequately demonstrate how these vital uses and habitats will be safeguarded from disruption.

A notable issue is the presumption that fishing activities can be relocated without adverse effects. The application lacks any evidence that alternative fishing grounds are available or can support the additional pressure caused by displacement. This significant gap raises the potential for overfishing in other areas, with possible wider economic repercussions for the local fishing fleet. Without a comprehensive and evidence-backed assessment, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable risks to marine species, especially due to the underwater noise generated during construction. The use of high-energy hammer piling over prolonged periods is expected to disturb a wide area, impacting species such as dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these effects without adequate supporting evidence.

The application also exhibits a contradictory stance regarding the need for licences for harm to European Protected Species, while simultaneously characterising the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises questions about adherence to the Habitats Regulations, particularly when harm is anticipated to a degree that necessitates legal authorisation.

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

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

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

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The application presents a range of significant risks and gaps that undermine its reliability and legality. The routing of infrastructure through active croft land raises concerns over potential conflicts with existing land use and legal rights. There is insufficient evidence provided to demonstrate that the necessary consents or processes have been initiated, which calls into question the deliverability and lawful implementation of the project.

The proposal also fails to adequately address the critical issue of carbon balance. Disturbances to peatland release stored carbon, leading to a carbon debt that could contradict the aims of renewable energy development. Without demonstrating that the overall carbon balance remains beneficial, the application lacks a crucial component necessary for a proper assessment.

Moreover, there are serious implications for sensitive habitats such as machair systems and peatland environments that are afforded policy protection. The application does not show that these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, indicating a clear evidential gap regarding biodiversity protection.

The assessment of onshore infrastructure is fundamentally flawed and incomplete, failing to consider the interconnected nature of the offshore turbines and onshore works. This fragmented approach obscures the true scale of environmental and socio-economic effects that arise from what is a single integrated project. The onshore components, including cabling across protected moorland and the construction of a substation near Stornoway, involve excavation in areas of deep peat, particularly within Barvas Moor, which is a significant carbon store and ecologically sensitive habitat. The lack of a comprehensive assessment of these impacts hinders a full understanding of the project's overall environmental footprint.

Additionally, the separation of offshore and onshore elements prevents the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project are considered together. However, by treating them separately, the combined impacts on peatlands, habitats, and communities remain inadequately understood.

From a policy standpoint, the failure to evaluate the project as a whole and demonstrate protection for peatlands, habitats, and land use interests is in conflict with the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further diminishes the application's validity. Collectively, these factors render this part of the application incomplete and unreliable, obstructing a lawful determination.

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The 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.

## **SUMMARY**

The application for the Spiorad na Mara Offshore Wind Farm presents a significant inadequacy in meeting the criteria for sustainable development when evaluated against statutory obligations, national policy, and evidential standards. It echoes the primary concerns that led to the rejection of the Lewis Wind Power proposal in 2008, wherein the unacceptable extent of industrialisation was highlighted. This current proposal, however, is put forward within a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

Moreover, the application lacks a comprehensive and reliable evidential basis essential for determination. There are substantial gaps in baseline data, the design envelope remains undefined, and there is an over-reliance on unspecified mitigation measures. Additionally, critical impact pathways concerning nocturnal wildlife, the full extent of onshore infrastructure, and potential tourism effects have been neglected. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of likely significant effects or residual impacts.

Procedural shortcomings are also evident. The failure to include a compliant Island Communities Impact Assessment is a breach of duty under the Islands (Scotland) Act 2018, while the incomplete Social Impact Assessment represents a significant omission. These issues obstruct the competent authority from adequately evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

In terms of alignment with National Planning Framework 4, the proposal is at odds with its requirements. It does not demonstrate adequate protection of biodiversity, natural areas, and cultural heritage. Furthermore, it has not substantiated that health and wellbeing impacts are acceptable, nor has it provided evidence of net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore components has been insufficient, obscuring crucial effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain ambiguous and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and contain internal inconsistencies. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful determination of acceptable impacts.

Additionally, the proposal threatens to induce substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual connections, and adverse effects on tourism represent permanent impacts that cannot be sufficiently mitigated.

In light of these factors, the application is both procedurally and substantively unfit for determination. The breadth of informational deficiencies, coupled with conflicts in policy and unresolved environmental risks, obstructs a lawful, evidence-based decision. Therefore, it is imperative that the competent authority refuse consent on these grounds or invoke the appropriate regulatory measures to obtain the requisite missing information.

Thus, 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: C13C1972

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

**Dear Sir/Madam**

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and its accompanying documents, highlighting significant deficiencies in planning, environmental, cultural, and procedural aspects. The development is proposed to be located off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns regarding its compatibility with statutory requirements, national policy, and the principles of sustainable development are deeply rooted in the scale, proximity, and design of the proposal.

The application is lacking a sufficient evidential foundation for a lawful determination. Key environmental data is absent, the baseline information provided is both limited and inconsistent, and critical elements of the proposal remain undefined. The reliance on a flexible design framework obscures the understanding of potential significant effects, while the dependence on unspecified mitigation measures renders their effectiveness unverifiable. Consequently, the documentation fails to facilitate a complete and informed understanding of the impacts on the environment, culture, or community, with assertions of negligible or non-significant effects lacking robust evidence.

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

The unprecedented scale of this proposal raises significant concerns, particularly regarding the positioning of large turbines in close proximity to the shoreline, which could adversely affect landscape capacity, visual dominance, and the environment. In light of the insufficient information provided, the reliance on undefined mitigation, evidential weaknesses, and evident policy non-compliance, it is clear that the application is incomplete and cannot sustain a lawful determination. Given these circumstances, the precautionary principle should be applied.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report lacks the necessary completeness and transparency to accurately reflect the potential environmental consequences of the proposal. A flexible Project Design Envelope has been employed, which does not commit to definitive turbine dimensions, layouts, or configurations. This approach introduces considerable uncertainty and obstructs the effective application of a worst-case scenario analysis. As a result, the integrity of the assessment is compromised, leading to a situation where the impacts detailed may not correspond to the actual development, thus hindering both public comprehension and the understanding of the competent authority regarding the real environmental effects.

The application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain unspecified. As consent is sought with the expectation that environmental harm will be addressed later, this creates an impediment to a genuine evaluation of the effectiveness of such measures and the assessment of residual impacts. This postponement of crucial information to post-consent phases is not procedurally acceptable and contradicts the aims of the Environmental Impact Assessment framework, which stipulates that significant effects and mitigation must be clearly outlined before a decision is made.

Moreover, there are considerable evidential shortcomings, including inadequacies in baseline data, methodological limitations, and a reliance on assumptions in lieu of site-specific evidence. These issues lead to uncertainty about the magnitude and significance of impacts, especially where claims of negligible or non-significant effects are made without solid supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot align with statutory requirements.

Consequently, the application does not meet the evidential standards mandated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This raises concerns related to the precautionary principle, especially in the context of protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it fails to prove that impacts have been thoroughly assessed or that adequate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation strategies, and the gaps in baseline data results in an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings impede a lawful and robust evaluation of environmental effects, leaving the competent authority ill-equipped to make an informed decision based on the information provided.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The assessment of community identity and cultural heritage surrounding the West Lewis coastline is fundamentally insufficient, failing to acknowledge the area as a dynamic cultural landscape where the environment, language, tradition, and

community are interwoven. The application adopts an overly simplistic view, treating heritage as a collection of isolated and static assets, rather than recognising their ongoing social, cultural, and spiritual roles within the community.

Notably, the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas, reveals a critical shortcoming. These sites serve as active places of burial and spiritual engagement, yet the assessment categorises them merely as static features. This oversight neglects their continued use and significance, as well as the implications of development on their surroundings. Such mischaracterisation leads to an inadequate evaluation of cultural effects and overlooks their importance in community life.

Moreover, the application neglects to address intangible aspects of cultural heritage, such as the Gaelic language, traditional practices, and the enduring connection between the community and the coastal environment. These factors are vital to the area's identity but are conspicuously absent from the assessment, marking a significant omission. The absence of these considerations hinders a full understanding of the development's cultural impact.

Concerns extend to community rights and engagement, particularly with the Gaelic-speaking population, which possesses a unique cultural identity recognised as characteristic of Indigenous Peoples. The lack of a Free, Prior and Informed Consent process further undermines the credibility of the assessment, failing to align with established principles of participation regarding decisions that affect cultural and environmental interests.

Additionally, a critical procedural failure is evident in the omission of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal obligation to examine the social, cultural, and economic effects on the island community, thus rendering any determination unlawful.

From a policy standpoint, these deficiencies place the proposal in direct contradiction to National Planning Framework 4, specifically concerning the protection of historic assets and locations. The neglect of both tangible and intangible heritage, as well as the failure to recognise living cultural practices, signifies a clear deviation from policy expectations.

In summary, the collective failure to evaluate living heritage, intangible cultural values, community rights, and legal obligations creates a considerable evidential gap. The cultural impacts associated with the development remain inadequately assessed, leaving the application lacking a solid foundation for gauging the true cultural cost of the proposal.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing significantly undermines the evaluation process. The developer has commissioned a Social Impact Assessment, which included focus groups with local residents, but has not published the full report. This omission creates a major evidential gap and obstructs the public and the competent authority from fully understanding the social risks highlighted by the developer's research.

Available summaries reveal that residents are already experiencing noticeable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement with the community and are not merely speculative. However, the failure to release the complete assessment hinders proper scrutiny of these findings and restricts the ability to gauge their importance in the decision-making process.

Additionally, there is evidence suggesting that the proposal threatens community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this, the application has not fully considered these impacts or given them adequate weight. By withholding the complete Social Impact Assessment, the true social and human costs associated with the development remain obscured.

This lack of transparency also compromises the Environmental Impact Assessment process. To fully understand the social, economic, and health impacts of developments of this magnitude, especially when community character and functioning are at stake, a comprehensive assessment is essential. The application does not present a complete evidential basis for weighing the benefits against the potential harm due to the absence of the full dataset.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Development must promote positive health outcomes and avoid negative effects, yet the available evidence suggests existing adverse impacts that have not been adequately disclosed. Without the complete assessment, demonstrating compliance with this policy is impossible.

The procedural implications of this situation are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This omission is a material failure within the application and does not meet the evidential requirements set by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, along with evidence of existing adverse effects, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information.

## **FISHERIES AND MARINE LIFE**

The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. Despite this, the application does not adequately address the potential ecological or socio-economic impacts, failing to ensure that these vital uses and habitats can be protected without significant disruption. A major concern is the unsubstantiated assumption that fishing activities can be displaced without negative consequences. The application lacks evidence to confirm that alternative fishing grounds are available and capable of supporting the increased pressure that such displacement would cause. This oversight is critical, as it raises the risk of overfishing in other areas and may lead to broader economic implications for the local fishing fleet. Without a detailed and evidence-based assessment, the effects on fisheries and local livelihoods remain unclear.

Moreover, the proposal poses significant risks to marine species, especially due to the underwater noise generated during construction. The high-energy hammer piling anticipated over an extended period is likely to disturb marine life across considerable distances, notably affecting species like dolphins. The potential disruption to a significant portion of the local bottlenose dolphin population is alarming, yet the application downplays these risks, lacking the necessary supporting evidence to justify such minimisation.

There is also a troubling inconsistency within the application, as it acknowledges the need for licenses to permit harm to European Protected Species while simultaneously characterising these impacts as negligible. This contradiction undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, particularly where anticipated harm necessitates legal authorisation.

Furthermore, the assessment does not adequately consider the cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately determined.

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

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

## **TOURISM**

The Isle of Lewis relies heavily on its tourism sector, which has seen remarkable growth from £65 million in 2017 to over £81.5 million, generating more than 1,000 jobs and

representing up to 16% of the island's economy. Despite this vital contribution, the assessment of tourism impacts within the application is significantly lacking, failing to address the economic and social consequences for this essential part of the local economy. The area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are crucial to attracting visitors, yet the application acknowledges that 86% of visitors are drawn by scenery without providing any quantified evaluation of how large-scale offshore infrastructure might alter visitor numbers, behaviour, or overall economic input.

The analysis does not model the potential repercussions of industrialising the seascape and deteriorating environmental quality on Tourism Gross Value Added or the island's broader economic resilience. Consequently, it remains unclear whether the proposed development would produce a net economic benefit or jeopardise a sector that is both established and growing. Furthermore, the critical role of environmental quality in supporting tourism has been overlooked, including the significance of unspoiled landscapes and dark skies for visitor experience, alongside emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a notable gap in understanding its impact on a recognised and expanding segment of the local economy.

In an island community with limited economic diversification, the inadequate assessment of tourism impacts carries broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been sufficiently evaluated, which is a requirement under the Islands (Scotland) Act 2018. From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly regarding economic impact and the necessity to show net benefit. It also conflicts with strategic objectives that designate tourism as a priority growth sector and lacks the evidence needed for the competent authority to assess the economic consequences of the proposal.

Overall, the failure to quantify tourism impacts, evaluate environmental factors influencing visitor behaviour, and acknowledge the island's economic dependency results in a significant evidential gap. This deficiency hinders a thorough evaluation of the economic effects, leading to the conclusion that the application is incomplete.

## **SUMMARY**

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements of sustainable development, as assessed against statutory duties, national policy, and evidential standards. It echoes the core issues of the 2008 refusal of the Lewis Wind Power proposal, which was deemed unacceptable due to the scale of industrialisation. This current application is presented under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis for the determination of this

application. The reliance on an undefined design envelope, unspecified mitigation measures, and the absence of key impact pathways, including nocturnal wildlife and full onshore infrastructure effects, render the Environmental Impact Assessment incomplete. Consequently, this lack of comprehensive data hampers the ability to fully understand the likely significant effects or residual impacts.

Moreover, there are procedural shortcomings that must be addressed. The failure to provide a compliant Island Communities Impact Assessment is a breach of the statutory duty under the Islands (Scotland) Act 2018. Additionally, the incomplete Social Impact Assessment represents a material omission that impedes the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience.

The proposal is inconsistent with National Planning Framework 4, which calls for the protection of biodiversity, natural places, and cultural heritage. It does not adequately demonstrate that the health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit due to the lack of tourism impact modelling. The failure to properly assess the cumulative impact of both offshore and onshore elements obscures important effects 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 contain inconsistencies that fail to meet the evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt. This necessitates the application of the precautionary principle, preventing a lawful conclusion regarding the acceptability of impacts.

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

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

### **Additional Comments**

I believe this development will have an adverse impact on the wildlife and beauty of the environment in this area of Lewis.

We have visited this area several times and really appreciated the remote wildness and the small nature of the crofts, the birds and wildlife as well as the sheep and chickens. In my opinion this wind farm will not be good for tourism as it will radically change the island landscape - the main reason people want to visit Lewis.

**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: 3C99628E

**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. An analysis of the Environmental Impact Assessment Report and accompanying documentation reveals significant planning, environmental, cultural, and procedural deficiencies. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the scale, proximity, and design of the proposal, particularly in relation to its compliance with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is limited and inconsistent. Many key aspects of the proposal remain undefined. The reliance on a flexible design framework impedes a clear understanding of the likely significant effects, while the dependence on unspecified mitigation measures means that their effectiveness cannot be assessed. Consequently, the documentation fails to facilitate a full or informed understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

Moreover, there are apparent and substantial conflicts with existing policies. 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 demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and hinder the competent authority's ability to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal presents significant challenges, with large turbines located in close proximity to the shoreline, raising serious concerns about landscape capacity, visual dominance, and environmental impact. When considering the insufficiency of information, the reliance on undefined mitigation strategies, evidential weaknesses, and evident policy non-compliance, it becomes clear that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must be applied.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The 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 application lacks a structured, evidence-based assessment of alternatives that complies with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a reasoned comparison of viable alternatives considering environmental effects, it merely recounts the evolution of the project. This narrative approach does not prove that the developer has adequately identified, assessed, and

chosen less harmful options over more damaging ones.

Furthermore, there is a complete absence of transparent comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the failure to consider the possibility of placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished, raises concerns. The West Lewis coastline is notably sensitive, and the critical nature of proximity to shore in evaluating impact means that without this analysis, it is impossible to conclude that the proposed site is indeed the least damaging choice.

The inadequacies extend to the evaluation of cable routing and landfall, where the evidence is insufficient to show that alternative routes have been thoroughly examined to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis signify that the application has not employed mitigation by design, opting instead for reliance on post-design mitigation measures.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This indicates a failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to ascertain whether more appropriate and less harmful alternatives are available. Without a comprehensive alternatives assessment, it cannot be affirmed that the proposal is sustainable or complies with relevant policies.

From a policy viewpoint, these deficiencies compromise adherence to National Planning Framework 4, particularly regarding the protection of natural areas, cultural heritage, and community well-being. The omission of a structured and comparative assessment is a significant shortcoming that contributes to the conclusion that the application has not been thoroughly evaluated and cannot be legally approved.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The assessment of marine ecology and protected species is seriously flawed, failing to deliver a comprehensive and dependable understanding of ecological receptors in the West Lewis coastal environment. This area is recognised as a highly sensitive and biologically rich marine system, yet the baseline data provided is lacking, and the methodologies employed do not adequately document species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

Notably, there is a significant oversight concerning otters, which are a European Protected Species. The application neglects to properly acknowledge and assess their use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns results in an inadequate evaluation of the potential impacts of construction disturbance, noise, and increased activity, thereby undermining any claims regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks reveals further weaknesses, as reliance on aerial surveys introduces considerable detection bias, especially under Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially when contrasted with established land-based observations that indicate frequent usage of these waters. The failure to properly incorporate or consider such crucial data results in an incomplete baseline, ultimately diminishing the credibility of the conclusions drawn.

The limitations in methodology mean that any conclusions suggesting negligible or non-significant effects are based on assumptions rather than rigorous evidence. The insufficient baseline data also inhibits a meaningful assessment of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This creates ambiguity regarding the true extent of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to adequately identify or assess protected species. The uncertainty introduced by these deficiencies obstructs the ability to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsupported conclusions renders the assessment unreliable. These significant deficiencies impede a thorough evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application lacks a sufficient evidential basis.

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The application proposes a development that poses risks to the west coast of the Isle of Lewis, a region supporting internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with this application is materially flawed, exhibiting significant gaps in evidence and internal inconsistencies that cast doubt on its conclusions. It fails to convincingly demonstrate that these species will not be adversely affected, particularly as the development is situated within key foraging areas and migratory pathways. The assessment does not adequately evaluate critical factors such as displacement, collision risk, or habitat loss.

A fundamental contradiction arises within the application, as the developer asserts that there will be no significant adverse effects while simultaneously making a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment, suggesting that the conclusions drawn are not substantiated by the evidence presented. The assessment lacks sufficient proof that seabirds associated with

protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. Furthermore, it does not adequately address the significance of these feeding grounds, and the reliance on modelling approaches introduces uncertainty, especially for species facing severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is incomplete and behavioural responses are not thoroughly understood.

The placement of turbines within a recognised migratory corridor adds another considerable risk, 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 consequences 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 fulfil the evidential threshold necessary to determine no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle, thereby obstructing a lawful conclusion in favour of consent.

Moreover, the identified deficiencies represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be adversely affected positions the proposal in direct conflict with national policy.

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

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

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

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

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

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

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

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

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

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The assessment of social impacts, health, and wellbeing lacks the necessary transparency required for a lawful evaluation, thus rendering it materially deficient. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents. However, the full report has not been published, creating a significant evidential gap that obstructs both public understanding and the competent authority's ability to grasp the full extent of social risks identified through the developer's own research.

Available summaries have indicated that local residents are already facing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These impacts are based on direct engagement, meaning they are not speculative. Yet, the absence of the full assessment limits proper scrutiny of these findings and hinders the evaluation of their significance in the decision-making process.

Furthermore, evidence suggests that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this identification, such impacts have not been adequately integrated into the main application or given the appropriate weight. Consequently, withholding the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this scale, especially when community character and functionality may be at risk. The failure to provide the complete dataset results in the application lacking a robust evidential basis for assessing the balance between benefits and harm.

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

The procedural implications of this situation are significant. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission within the application, failing to meet the evidential requirements of the Environmental Impact Assessment regime.

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

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The assessment regarding the seascape, landscape, and visual impacts presents significant deficiencies, failing to accurately depict the extent of change and the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its expansive Atlantic horizon, unspoiled nature, and a profound sense of remoteness. The proposed introduction of large-scale turbines near the shoreline would establish a continuous and overpowering industrial presence, fundamentally transforming this character and resulting in a permanent, irreversible alteration of the landscape.

The application does not sufficiently capture the magnitude of the visual changes anticipated. Given the size and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would have a direct adverse effect on visual amenity and undermine the essential qualities of naturalness and remoteness. Furthermore, the assessment inadequately

communicates the significance of these impacts within the context of such a sensitive landscape.

Methodological issues arise concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and high-value landscapes. This situation raises concerns that the visual impact may have been understated, thereby calling into question the reliability of the assessment.

Additionally, there is a notable lack of evaluation regarding the interconnected nature of landscape, seascape, and cultural heritage. Significant sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape, linked by visual and spatial relationships to the Atlantic horizon. The assessment erroneously treats these sites as isolated entities without recognising their interdependence, which results in an incomplete analysis of the impacts on their settings and cultural importance.

The proposed industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are perceived and breaking their connection to the natural horizon. This represents not merely a visual issue but a more profound 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 regarding the safeguarding of natural places and historic assets. The anticipated scale of change is at odds with the requirement to maintain landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertion of policy compliance.

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

Overall, the assessment fails to accurately portray the scale of impact, the environment's sensitivity, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal 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.

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The application suffers from a significant shortcoming in its assessment of onshore infrastructure, which is fundamentally incomplete and overlooks the interdependence of the offshore turbines and the onshore works. This disconnected analysis obscures the full extent of both environmental and socio-economic impacts that arise from what constitutes a single integrated project.

Included in the onshore elements are critical infrastructure components, such as

cabling that traverses protected moorland and the construction of a substation in proximity to Stornoway, along with access infrastructure that passes through sensitive landscapes. Notably, these activities necessitate excavation in regions of deep peat, particularly within Barvas Moor, a vital carbon store and ecologically sensitive habitat. The application fails to deliver a thorough assessment of these impacts, thereby hindering a complete understanding of the environmental footprint of the project.

The omission or postponement of the assessment concerning onshore impacts obstructs a comprehensive evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be reviewed in conjunction, yet the current separation of offshore and onshore factors prevents an accurate understanding of their combined impacts on peatlands, habitats, and local communities.

Furthermore, there are significant risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected under current policies. The lack of demonstration that the potential impacts on these habitats have been fully examined, or that suitable avoidance strategies have been implemented, highlights a critical evidential gap in terms of biodiversity protection.

Concerns are also raised regarding carbon balance, as the disturbance of peatland could lead to the release of stored carbon, potentially resulting in a carbon debt that contradicts the principles underpinning renewable energy development. The application does not sufficiently address this matter or prove that the overall carbon balance remains favourable.

Moreover, the proposed routing of infrastructure through active croft land brings forth the possibility of conflicts with existing land use and legal rights. The application does not provide sufficient evidence that the requisite consents or processes have been initiated, leading to uncertainties surrounding both deliverability and lawful execution of the project.

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

In conclusion, the fragmented separation of project components, the absence of a comprehensive assessment, and the insufficiency of evidence regarding environmental and land use impacts collectively render this segment of the application incomplete and unreliable, obstructing a lawful determination.

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The proposal lacks a crucial assessment of dark skies and nocturnal wildlife, representing a significant omission within the Environmental Impact Assessment. The

West Lewis coastline is known for its exceptionally dark skies, which play a vital role in environmental quality, cultural identity, and the tourism sector. The introduction of permanent red aviation lighting, which would be visible over long distances, would create a continuous and intrusive “wall of light” effect across the western horizon. This change would fundamentally alter the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. This is particularly important as dark skies are integral to the area’s identity and to emerging sectors like astro-tourism. The omission results in a significant gap in the landscape and environmental assessment.

More importantly, there is no analysis of how the proposal would impact nocturnal wildlife. Birds such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are especially sensitive to artificial lighting, which can disorient them and increase the risk of collisions. The application does not incorporate any lighting impact assessment or phototaxis study, leading to a failure to determine how aviation lighting may affect these species or contribute to increased mortality rates.

The use of daytime survey data in the ornithological assessment further complicates the situation, as it does not account for nocturnal activity or related risks. Species like Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation caused by artificial lighting; however, this risk has not been addressed. The lack of site-specific night-time data creates a significant gap in understanding the ecological impacts.

Without a proper evaluation of nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites may be adversely impacted. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful determination.

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

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

## **SUMMARY**

The application for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. This proposal mirrors the core issues of the

2008 Lewis Wind Power application, where the level of industrialisation was deemed unacceptable. Notably, it is now being advanced under a policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A critical examination reveals that the application does not present a comprehensive or reliable evidential basis for evaluation. There are significant gaps in baseline data, the design envelope remains undefined, and reliance on unspecified mitigation measures further complicates the assessment. Key impact pathways have been omitted, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism effects. As such, the Environmental Impact Assessment is incomplete, failing to provide clarity on likely significant effects or residual impacts.

Procedural deficiencies are evident, particularly the lack of a compliant Island Communities Impact Assessment, which constitutes a breach of duty under the Islands (Scotland) Act 2018. Additionally, the failure to disclose a full Social Impact Assessment represents a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings render the application unfit for determination.

Moreover, the proposal contravenes National Planning Framework 4. It does not adequately safeguard biodiversity, natural places, and cultural heritage. The evidence provided does not support that health and wellbeing impacts are acceptable, nor does it demonstrate a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain uncertain and may be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and contain inconsistencies. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion on the acceptability of impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The multitude of information deficiencies, alongside conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must either reject this application on these grounds or invoke the relevant regulatory provisions to compel the submission of the missing information.

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

### **Additional Comments**

The wind turbines will not only deteriorate the natural beauty of the area but also the influx of temporary workers housing and the number of workers in Stornoway will put strain on the services of Lewis. I am particularly concerned about the workers camp going into the site in Marybank right opposite my house. I work away from home a lot and my fiancée will be on her own with 250 workers next door.

**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: 791BE5A8

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

**Dear Sir/Madam**

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under marine licensing and Environmental Impact Assessment regimes. Our concerns arise from a detailed review of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies across planning, environmental, cultural, and procedural aspects.

The location of the proposed development off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline and rich cultural heritage, raises fundamental questions about the compatibility of this large-scale project with established statutory requirements and principles of sustainable development. The proximity of the proposed large turbines to the shoreline amplifies worries regarding landscape capacity and visual impact, which are critical in this near-pristine environment.

Inadequate evidence supporting the application is a core issue. Missing critical environmental data, inconsistent baseline information, and undefined aspects of the proposal hinder a comprehensive understanding of its potential effects. The flexible design framework complicates the assessment of significant impacts, while unspecified mitigation measures leave their effectiveness unquantifiable. Consequently, the documentation does not provide a complete understanding of the environmental, cultural, or community consequences, undermining claims of negligible effects that lack substantial evidence.

Moreover, the application reveals notable conflicts with existing policies. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, cultural heritage, and health and wellbeing. The failure to demonstrate compliance with national requirements for biodiversity protection and environmental integrity raises serious concerns.

Overall, the unprecedented scale of this proposal, coupled with insufficient information and evident policy non-compliance, indicates that the application is incomplete and unable to support a lawful determination. In light of these issues, it is imperative that the precautionary principle be observed.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report lacks essential detail and fails to provide a comprehensive, transparent account of the likely environmental impacts of the

proposal. The flexible Project Design Envelope approach, which does not commit to specific dimensions, layouts, or configurations of the turbines, introduces considerable uncertainty. This uncertainty obstructs a consistent application of a worst-case scenario and undermines the assessment's integrity, preventing both the public and the relevant authorities from fully understanding the true environmental implications of the development.

Moreover, the application depends heavily on mitigation measures, monitoring strategies, and management plans that remain undefined. By seeking consent based on the premise that environmental harm will be addressed at a later date, the application hinders any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contravenes the principles of the Environmental Impact Assessment regime, which mandates that significant effects and mitigations are clearly established before any decision is made.

There are also notable evidential shortcomings, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. Such deficiencies create uncertainty regarding the scale and significance of impacts, especially when negligible or non-significant effects are claimed without robust supporting data. The lack of sufficient information inhibits a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot satisfy statutory requirements.

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

In summary, the 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 deficiencies obstruct a lawful and thorough evaluation of environmental effects, leaving the competent authority unable to make an informed determination based on the information provided.

## **ASSESSMENT OF ALTERNATIVES**

The application fails to provide a structured and evidence-based assessment of alternatives, which is a significant shortcoming under the Environmental Impact Assessment regime. It does not offer a reasoned comparison of realistic alternatives based on their environmental effects. Instead, it merely presents a narrative of project development, lacking clarity on whether less harmful options have been adequately identified, assessed, and chosen over more damaging solutions.

There is a notable absence of transparent analysis regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has seriously considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be diminished. Given the sensitivity of the West Lewis coastline and the critical nature of proximity to the shore in determining impacts, this lack of analysis undermines any conclusion that the proposed siting is the least damaging available option.

This inadequacy also extends to cable routing and landfall assessments, where there is insufficient evidence to show that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The absence of a clear strategy to avoid impacts, combined with a lack of comparative analysis, suggests that mitigation by design has not been employed, leading to a reliance on post-design mitigation measures instead.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This oversight represents a failure to adhere to the established mitigation hierarchy and inhibits the competent authority's ability to determine whether more appropriate and less harmful alternatives exist. Without a comprehensive assessment of alternatives, it cannot be established that the proposal is sustainable or compliant with policy requirements.

From a policy standpoint, this deficiency undermines 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 that leads to the conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The assessment of marine ecology and protected species is fundamentally inadequate, failing to provide a comprehensive or trustworthy understanding of the ecological receptors in the West Lewis coastal environment. This area is known for its biological sensitivity and activity, yet the baseline data presented is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of the species within this marine system. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A significant oversight involves the otters, classified as a European Protected Species, where the application neglects to appropriately acknowledge and assess their usage of coastal regions for foraging and movement. Without considering their core foraging range and behavioural tendencies, the assessment does not adequately address the possible impacts of construction-related disturbances, noise, and increased human activity. This shortcoming undermines any conclusions drawn about the lack of

significant effects on this particular species.

Moreover, the evaluation of basking sharks reveals further deficiencies; reliance on aerial surveys leads to substantial detection bias, especially under Atlantic conditions. This method is likely to result in an underestimation of their presence, particularly when compared to established land-based observations that suggest these waters are frequently used by the species. The oversight in incorporating or accurately considering such information leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws mean that conclusions regarding negligible or non-significant effects are largely based on assumptions rather than solid evidence. Additionally, the lack of adequate baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variations and the broader ecosystem interactions. This uncertainty clouds the true extent of risk faced by marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements outlined in the Environmental Impact Assessment regime and National Planning Framework 4, as there has been no thorough identification or assessment of protected species. The uncertainty generated by these deficiencies obstructs the exclusion of adverse effects beyond reasonable scientific doubt, necessitating adherence to the precautionary principle. In light of these considerations, it is clear that consent cannot be lawfully granted.

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

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The proposed development includes the siting of turbines within key foraging areas and a recognized migratory corridor on the west coast of the Isle of Lewis, which supports internationally important seabird populations. These populations are already experiencing declines, yet the ornithological assessment provided fails to demonstrate adequately that they will not be adversely affected. The assessment lacks sufficient evidence regarding the impacts on seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda. The methodologies employed introduce significant uncertainty, particularly concerning species like Kittiwakes and Fulmars that are in severe decline.

A fundamental contradiction arises within the application itself, as the developer claims there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, a process required when significant harm is anticipated. This inconsistency undermines the reliability of the assessment and

suggests that its conclusions are unsupported by the evidence presented. The siting of turbines within a primary flight path poses an additional significant risk, creating a barrier for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor have not been adequately assessed.

From a regulatory standpoint, the application does not meet the evidential threshold to conclude no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and modelling limitations indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, obstructing any lawful conclusion in favour of consent. Moreover, the identified deficiencies indicate non-compliance with National Planning Framework 4 regarding biodiversity protection and safeguarding natural assets. The proposal's inability to demonstrate that internationally important seabird populations will remain unaffected directly conflicts with national policy.

Overall, the assessment's internal inconsistencies, methodological flaws, and inadequate evidence render it unreliable. These shortcomings prevent a thorough evaluation of the impacts and lead to the conclusion that the application does not satisfy the statutory requirements essential for determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The evaluation of community identity and cultural heritage is seriously lacking. It does not recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community interact deeply. The application reduces heritage to static, isolated assets instead of acknowledging their ongoing social, cultural, and spiritual roles in the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are treated inadequately. These sites are active burial grounds and places of spiritual significance, yet the assessment labels them as mere static features, failing to account for their continued relevance and the implications of development on their surroundings. This mischaracterisation leads to an incomplete understanding of the cultural impacts and ignores their importance in community life.

Moreover, the assessment overlooks intangible cultural heritage, which includes the Gaelic language and local traditions, as well as the community's long-standing bond with the coastal environment. These aspects are essential to the area's identity but are entirely omitted from the evaluation, creating a significant gap in understanding the cultural impact of the proposed development.

Concerns also arise regarding community rights and involvement. The Gaelic-speaking population has a unique cultural identity akin to that of Indigenous Peoples, yet there has been no Free, Prior and Informed Consent process. The lack of genuine engagement calls into question the credibility of the assessment and fails to align with established participation principles in decisions affecting cultural and environmental matters.

There is a crucial procedural oversight regarding the absence of a proper Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the relevant authority cannot meet its legal obligations to assess the social, cultural, and economic effects on the island community. This lack of assessment alone obstructs a lawful decision.

From a policy standpoint, these shortcomings directly contradict the requirements of the National Planning Framework 4, particularly concerning the safeguarding of historical assets. The failure to account for both tangible and intangible heritage and to recognise ongoing cultural practices clearly deviates from established policy guidelines.

Overall, the neglect to evaluate living heritage, intangible cultural significance, community rights, and necessary statutory assessments results in a major evidential deficiency. The cultural effects of the development remain unexamined, and the application fails to provide an adequate foundation for determining the true cultural costs 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 evaluation of the visual, seascape, and landscape impacts is inadequate and does not truly capture the extent of change or the sensitivity of the environment involved. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a significant sense of remoteness. The placement of large-scale turbines near the shoreline would lead to a dominant industrial presence that would fundamentally change this character, resulting in a permanent and irreversible alteration of the landscape.

The application fails to properly depict the degree of visual change that would occur. Due to their scale and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations. This would have a direct effect on visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not adequately communicate the level of impact or its importance within such a sensitive landscape context.

Methodological issues arise concerning the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not sufficiently represent the most sensitive receptors or the worst-case scenarios, especially in relation to key cultural heritage sites and high-value landscapes. This raises concerns that the actual magnitude of visual impact may have been underestimated, thereby casting doubt on the assessment's reliability.

Additionally, there is a failure to recognise 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 context linked by visual and spatial relationships to the Atlantic horizon. The assessment fails to

acknowledge this interdependence, treating these heritage assets as isolated, which leads to an incomplete understanding of their setting and cultural significance.

The industrialisation of the seascape would sever these vital connections, transforming the context in which 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 sufficiently evaluated in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the protection of natural spaces and historical assets. The magnitude of change is incompatible with the necessity to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further diminishes any assertions of policy compliance.

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

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

## **CONSTRUCTION AND POLLUTION RISKS**

The proposal presents significant concerns regarding the assessment of construction and pollution risks, which is incomplete and lacks the necessary detail to evaluate potential environmental effects. It involves considerable seabed preparation and installation work within a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on mitigation and contingency measures that are to be prepared after consent, hindering any meaningful evaluation of their adequacy or effectiveness.

The reliance on unspecified future measures raises particular concerns in light of the sensitivity of the receiving environment. The West Lewis coastline is known for its clean coastal waters and significant habitats, both of which are susceptible to sediment disturbance and contamination. Although the application acknowledges risks associated with sediment mobilisation and the potential for accidental chemical or oil spills, it fails to offer sufficient detail on the prevention, control, or monitoring of these risks.

There exists uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without rigorous modelling

and well-defined management strategies, it remains impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also applies to potential effects on marine species and habitats identified as sensitive in the broader assessment.

Further compounding these issues is the absence of detailed emergency response procedures. The decision to defer contingency planning until after consent prevents the evaluation of whether adequate safeguards will be in place to address pollution incidents. This introduces procedural risks 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. It is imperative that likely significant effects and mitigation measures be assessed prior to granting consent. In cases where this information is absent, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

## **FISHERIES AND MARINE LIFE**

The application presents significant deficiencies in its assessment of marine life and fisheries, failing to provide a comprehensive evaluation of ecological or socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry. However, the proposal does not demonstrate that these habitats and uses can be safeguarded from disruption.

One major issue is the assumption that fishing activities can be displaced without adverse effects. The application lacks evidence that alternative fishing grounds exist, are accessible, or can endure additional pressure. This absence of information is crucial, as such displacement could lead to overfishing in other areas and have broader economic implications for the local fishing fleet. Without a thorough and evidence-based assessment, the potential effects on fisheries and local livelihoods remain unclear.

The proposal also poses significant risks to marine species, particularly due to underwater noise from construction activities. Prolonged hammer piling may disturb marine life over large areas, with the local bottlenose dolphin population expected to be significantly affected. The application downplays the seriousness of these impacts without adequate evidence, raising concerns about its reliability.

Moreover, there is a noticeable inconsistency within the application regarding the need

for licences to harm European Protected Species, while simultaneously classifying these impacts as negligible. This contradiction questions the credibility of the assessment and highlights potential issues with compliance under the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal authorisation.

The assessment neglects to address cumulative impacts arising from various pressures, such as habitat disturbance, noise pollution, and fishing displacement. 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 viewpoint, 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 current marine users or that it can avoid unacceptable impacts on marine biodiversity. Consequently, it cannot be concluded that the proposal constitutes sustainable development.

In summary, the combination of insufficient evidence regarding fishing displacement, underappreciation of acoustic impacts, and internal inconsistencies renders the assessment unreliable. These shortcomings obstruct a thorough evaluation of the impacts on marine life and fisheries.

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The assessment of the onshore infrastructure is fundamentally lacking and does not adequately address the full scope of impacts associated with what constitutes a single integrated project. The interconnected nature of the offshore turbines and onshore works is not reflected in the evaluation, which treats them separately, thereby obscuring the true extent of environmental and socio-economic consequences.

Significant onshore elements, including cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure, traverse sensitive landscapes. These undertakings involve excavations in areas of deep peat, particularly in Barvas Moor, a crucial carbon store and ecologically sensitive habitat. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

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

The proposal raises additional serious concerns about sensitive habitats, such as machair systems and peatland environments, which are safeguarded by policy. The application does not convincingly demonstrate that impacts on these habitats have been fully evaluated or that suitable avoidance measures have been put in place. This

results in a significant evidential gap concerning biodiversity protection.

Furthermore, the disturbance of peatland poses a risk to carbon balance, as it releases stored carbon and could lead to a carbon debt that contradicts the goals of renewable energy development. The application inadequately addresses this critical issue and fails to show that the overall carbon balance remains advantageous.

The routing of infrastructure through active croft land also introduces potential conflicts with existing land use and legal rights. The application lacks evidence that the required consents or processes have been initiated, raising serious concerns regarding the project's deliverability and lawful implementation.

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

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

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The Environmental Impact Assessment lacks an assessment of dark skies and nocturnal wildlife, representing a significant omission. 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 introduction of permanent red aviation lighting will create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

There is no evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the role of dark skies in the area's identity and the potential growth of astro-tourism. The lack of consideration for these impacts creates a notable gap in the overall landscape and environmental assessment.

Furthermore, the proposal does not assess the effects of artificial lighting on nocturnal wildlife. Sensitive species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are at risk of disorientation and collision due to phototaxis, yet the application omits any lighting impact assessment or phototaxis study. This means there is no analysis of how aviation lighting might affect these species or contribute to increased mortality.

The reliance on daytime survey data in the ornithological assessment fails to capture nocturnal activity and associated risks. Species like Kittiwakes, which may forage or migrate at night, also face the risk of disorientation from artificial lighting, yet this risk

has not been evaluated. The lack of site-specific night-time data leaves a critical gap in understanding ecological impacts.

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

From a policy standpoint, these omissions contradict National Planning Framework 4 regarding the protection of natural places and environmental quality. This failure also undermines the overall assessment of landscape and seascape impacts, as night-time character is a vital component of the environment.

In summary, the complete absence of assessments concerning dark skies and nocturnal wildlife results in a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis makes the application incomplete and unfit to support a lawful determination.

## **TOURISM**

The assessment of tourism impacts in the application is inadequate and overlooks the economic and social effects on a vital part of the Isle of Lewis economy. Tourism is heavily reliant on the island's natural features, such as its wild coastline, near-pristine landscapes, dark skies, and the feeling of remoteness. Although it is noted that 86% of visitors are attracted by the scenery, there is no analysis provided to quantify how large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contribution from tourism.

The economic significance of tourism is notable, with growth from £65 million in 2017 to over £81.5 million, alongside the support of more than 1,000 jobs, representing up to 16% of the island's economy. However, the application fails to forecast the potential effects of industrialising the seascape and diminishing environmental quality on Tourism Gross Value Added or the broader economic resilience of the area. Without this evaluation, it remains unclear if the development would yield a net economic advantage or disrupt a well-established and expanding sector.

Additionally, the assessment does not address the significance of environmental quality for tourism. This includes the crucial role of unspoiled landscapes and dark skies in enhancing visitor experiences, as well as the emerging markets of nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this oversight, leaving a critical gap in understanding the impacts on a recognised and expanding segment of the local economy.

In a community like this island, which has limited economic diversification, the neglect to assess tourism impacts has broader implications for employment, local businesses, and community sustainability. The absence of a proper Island Communities Impact Assessment means that these economic risks have not been evaluated as stipulated

under the Islands (Scotland) Act 2018.

From a policy viewpoint, the application does not meet the standards of the National Planning Framework 4, especially concerning economic impact and the necessity to demonstrate net benefit. It is at odds with strategic goals that recognise tourism as a priority growth area and fails to provide enough evidence for the competent authority to evaluate the economic effects of the proposal.

In conclusion, the combination of the lack of quantification of tourism impacts, the failure to assess the environmental factors influencing visitor behaviour, and the oversight of the island's economic reliance on tourism leads to a significant evidential gap. This gap hinders a thorough assessment of the economic repercussions and indicates that the application is incomplete.

## **SUMMARY**

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

The evidential basis for the application is incomplete and unreliable. There are significant gaps in the baseline data, an undefined design envelope is used, and there is a reliance on unspecified mitigation measures. Moreover, key impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and effects on tourism are omitted. Consequently, the Environmental Impact Assessment is insufficient, failing to provide a clear understanding of likely significant effects or residual impacts.

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

Additionally, the proposal conflicts with the National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural places, or cultural heritage. It fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of offshore and onshore components have not been assessed appropriately, which clouds the understanding of impacts on peatlands, carbon balance, habitats, and crofting land.

There are also significant uncertainties regarding environmental risks. The assessments

concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and at times inconsistent. The required evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been met, activating the precautionary principle and precluding any lawful conclusion about the acceptability of impacts.

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

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

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

### **Additional Comments**

I am <sup>100</sup> not in support of this awful project. We live on the coast line and will be directly impacted by this awful project.

Personally I feel that the community benefit is simply a kick in the teeth to us that are directly affected.

Our beautiful views are going to be ruined by the humongous eyesores. I can't understand why they are so close to our beautiful Island. I just do not get it and what benefits will we get for it, diddly squad, not that I or we want it. We do not want our island ruined because of these monsters.

Our beautiful sunsets are going to be ruined and for what 🙄 certainly not us locals. Our views and thoughts have never been asked for or considered.

Let me say it again WE DO NOT WANT THESE AWFUL THINGS OUTSIDE OUR HOUSE OR NEAR OUR ISLAND.

**Yours faithfully,**

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 1E19FDDE

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

**Dear Sir/Madam**

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The scale of the proposal is unprecedented in this location, with large turbines positioned in close proximity to the shoreline. This introduces significant concerns regarding landscape capacity, visual dominance, and environmental impact.

The application does not provide an adequate evidential basis for a lawful determination. Critical environmental data is missing, baseline information is limited and inconsistent, and key aspects of the proposal remain undefined. The use of a flexible design framework prevents a clear understanding of likely significant effects, while the reliance on mitigation measures that have not yet been specified means their effectiveness cannot be assessed. Consequently, the documentation does not enable a full or informed understanding of environmental, cultural, or community impacts. Claims of negligible or non-significant effects are not supported by robust evidence.

There are clear and substantive conflicts with policy. The proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly evident concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate that national requirements to protect biodiversity, climate interests, and environmental integrity can be met. Such conflicts directly affect the statutory tests required for consent and undermine the ability of the competent authority to conclude that the development is acceptable in policy terms.

Given the absence of sufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete and incapable of supporting a lawful determination. In these circumstances, the precautionary principle must apply. The development is located off the west side of the Isle of Lewis, an area defined by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The concerns raised regarding the compatibility of the proposal with statutory requirements, national policy, and the principles of sustainable development are fundamental.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report is inadequate and does not offer a comprehensive or dependable account of the potential environmental effects associated with the proposal. The application's reliance on a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or

configurations, introduces significant uncertainty. This ambiguity undermines the assessment's integrity and may lead to a misrepresentation of the actual impacts of the development, thereby hindering both public understanding and the competent authority's ability to gauge the true extent of the environmental consequences.

Furthermore, the application places considerable emphasis on unestablished mitigation measures, monitoring strategies, and management plans. Seeking consent under the assumption that environmental harm will be resolved later obstructs meaningful evaluation of these measures' effectiveness and the assessment of residual impacts. This deferral of crucial information to post-consent stages contravenes the intended purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies are clearly delineated before any determination is made.

Additionally, the report exhibits serious evidential shortcomings, including insufficient 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 the impacts, particularly where negligible or non-significant effects are asserted without robust supporting evidence. The lack of adequate information hampers a thorough understanding of cumulative and worst-case impacts, generating scientific uncertainty that fails to align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated by the Habitats Regulations, as it does not eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also does not demonstrate adherence to National Planning Framework 4, including standards related to biodiversity protection and environmental integrity, since it cannot prove that impacts have been comprehensively assessed or that suitable safeguards are in place.

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

## **ASSESSMENT OF ALTERNATIVES**

The application inadequately addresses the assessment of alternatives, failing to meet the requirements of the Environmental Impact Assessment regime. Instead of providing a structured and reasoned comparison of realistic alternatives based on their environmental impacts, it offers merely a narrative of project evolution. This method does not prove that less harmful options have been properly identified or assessed in preference to more damaging solutions.

The lack of a transparent, evidence-based comparison regarding alternative offshore

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

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

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

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

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The assessment of the marine ecology and protected species is inadequate and fails to provide a reliable understanding of the ecological receptors in the West Lewis coastal environment. This area is biologically active and sensitive, yet the baseline data is lacking, and the methodologies used do not capture the presence, behaviour, and habitat use of species effectively. Consequently, the assessment does not provide a solid evidential basis for evaluating potential impacts.

One significant oversight is the assessment of otters, a European Protected Species. The application does not adequately recognise and assess their active use of the coastal areas for foraging and movement. Without considering their core foraging range and behavioural patterns, the potential impacts of construction disturbance, noise, and increased activity have not been fully evaluated. This shortcoming undermines conclusions regarding the absence of significant effects on this species.

Furthermore, there are deficiencies in the assessment of basking sharks due to reliance on aerial surveys, which introduce considerable detection bias, particularly under

Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that show these waters are frequently used by the species. The failure to include or properly consider such data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological flaws result in conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This leads to uncertainty regarding the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment requirements or the National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt and necessitates the application of the precautionary principle. In light of this, consent cannot be lawfully granted.

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

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The assessment of the proposed development is fundamentally flawed, exhibiting significant internal inconsistencies and gaps in evidence that compromise its conclusions. The presence of internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already experiencing declines, is not adequately addressed. The application fails to meet the required evidential standard to demonstrate that these species will not be adversely affected. Furthermore, the development is situated within key foraging areas and migratory pathways, yet the evaluation does not thoroughly assess the implications of displacement, collision risk, or habitat loss.

A notable contradiction exists in the application, as the developer claims there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only invoked when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are unsupported by the evidence provided. The assessment also lacks sufficient evidence that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not sufficiently recognised, and reliance on modelling techniques introduces uncertainty, particularly for species in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially in cases where baseline data is incomplete and behavioural responses remain

inadequately understood.

The siting of turbines within a recognised migratory corridor presents an additional and substantial risk, as it effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to sufficiently evaluate the long-term consequences of sustained mortality within this corridor or the potential effects on species with relatively small global populations.

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

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

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

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

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

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas represent active places of burial and spiritual practice. Yet, the assessment inaccurately categorises them as static features, neglecting their continued use, meaning, and the potential impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects, disregarding their essential role in community life.

Moreover, the assessment does not 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 area's identity but are entirely absent from the assessment, marking a significant omission that prevents a proper understanding of the cultural impact of the development.

Community rights and engagement further exacerbate the situation. The Gaelic-speaking population possesses a distinct cultural identity with recognised characteristics of 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 regarding decisions that affect cultural and environmental interests.

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

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

Collectively, 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 properly assessed, and the application does not provide a sufficient basis for evaluating the true cultural cost of the proposal.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The procedural implications of this situation are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This omission within the application indicates a failure to meet the evidential standards required under the Environmental Impact Assessment regime.

Moreover, there is a significant deficiency in the assessment of social impacts, health, and wellbeing, which lacks the transparency needed for a lawful evaluation. 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 creates a considerable evidential gap, hindering both the public and the competent authority from comprehensively understanding the social risks highlighted 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 proposal. These impacts stem from direct engagement with the community and are therefore not speculative in nature. Nonetheless, the failure to disclose the complete assessment obstructs proper examination of the findings and restricts the capacity to ascertain their significance in the decision-making process.

In addition, the proposal is perceived as a direct threat to community identity and cohesion, with “cultural loss” acknowledged in the developer's findings. Despite this recognition, such impacts have not been adequately incorporated into the main application or assigned appropriate significance. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

The lack of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly in relation to potential effects on community character and functionality. By failing to provide the complete dataset, the application does not offer a sufficient evidential foundation for weighing benefits against 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 mitigate harm; however, the evidence currently available suggests the presence of adverse effects that have not been fully disclosed. Without the complete assessment, it is impossible to establish compliance with this policy.

In conclusion, the combination of non-disclosure of the full Social Impact Assessment and the evidence of existing negative impacts renders the assessment incomplete and unreliable. This situation hinders a lawful determination and reinforces the assertion that the application lacks adequate information to support it.

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The assessment of visual impacts, seascape, and landscape is significantly flawed, failing to adequately capture the extent of change or the sensitivity of the receiving environment. The West Lewis coastline features an open Atlantic horizon, retains an undeveloped character, and exudes a strong sense of remoteness. The proposed large-scale turbines, situated near the shoreline, would introduce a continuous and dominant industrial presence that would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

Furthermore, the application does not accurately represent the magnitude of the anticipated visual change. The size and proximity of the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, thereby directly impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. This level of impact and its significance within such a sensitive landscape context are inadequately conveyed in the assessment.

There are also concerns regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not fully encompass the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the

possibility that the visual impact has been understated, compromising the assessment's reliability.

Moreover, the evaluation fails to address 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 linked by visual and spatial relationships to the Atlantic horizon. The assessment considers these assets in isolation, neglecting their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are perceived and severing their connection to the natural horizon. This constitutes not just a visual impact but also a wider cultural and spatial harm that remains inadequately assessed within the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4, which is intended to protect natural areas and historic assets. The scale of proposed changes is at odds with the requirement to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertions of policy compliance.

Additionally, it is evident that the identified impacts cannot be effectively mitigated. Due to the turbines' scale, height, and proximity, their presence would be dominant and unavoidable. The resulting change is thus fundamental and permanent, making it impossible to reduce the impact to an acceptable level through any mitigation efforts.

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

## **CONSTRUCTION AND POLLUTION RISKS**

The assessment of construction and pollution risks is lacking in detail, making it difficult to evaluate potential environmental effects. There is substantial seabed preparation and installation work proposed in a high-energy Atlantic environment, yet there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on mitigation and contingency measures that would be prepared after consent is granted, which hampers any meaningful assessment of their effectiveness or adequacy.

Given the sensitivity of the receiving environment, this reliance on undefined future measures is particularly concerning. The West Lewis coastline is home to clean coastal waters and important habitats that could be impacted by sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide adequate detail on how these issues will be prevented, controlled, or monitored.

Additionally, there is uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also extends to the potential effects on marine species and habitats that are already known to be sensitive within the broader assessment.

The lack of detailed emergency response procedures further exacerbates these concerns. By postponing contingency planning until after consent is obtained, the application inhibits the evaluation of whether sufficient safeguards are in place to address pollution incidents. This creates procedural risk and undermines the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the Environmental Impact Assessment regime requirements. Significant effects and mitigation measures must be assessed prior to granting consent, and without this information, a lawful determination cannot be made. The application also does not demonstrate compliance with policy requirements related to environmental protection and water quality.

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

## **FISHERIES AND MARINE LIFE**

The application presents a concerning inadequacy in the assessment of fisheries and marine life, failing to deliver a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry, yet the proposal does not adequately demonstrate that these vital uses and habitats can be preserved without significant disruption.

One of the major concerns is the flawed assumption that fishing activity can be displaced without repercussions. The absence of evidence supporting the availability, accessibility, or capability of alternative fishing grounds to handle increased pressure is notable. This gap is critical, as such displacement could lead to overfishing in other areas and have broader economic ramifications for the local fishing fleet. Without a solid, evidence-based assessment, it remains impossible to accurately gauge the impacts on fisheries and the livelihoods that depend on them.

Furthermore, 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 duration is expected to disturb a wide area, potentially affecting species such as dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population raises serious red flags, yet the application downplays these concerns without adequate supporting evidence.

There is a glaring inconsistency in the application where the need for licences to permit harm to European Protected Species is acknowledged, while simultaneously, the impacts are described as negligible. This contradiction casts doubt on the credibility of the assessment and raises serious compliance issues with the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal authorisation.

Additionally, the assessment overlooks the cumulative impacts stemming from multiple pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. Lacking a thorough evaluation of these combined effects, it is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not substantiate compliance with 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, thereby precluding any conclusion that the proposal can be considered sustainable development.

Overall, the deficiencies in demonstrating evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the application result in an incomplete and unreliable assessment. These shortcomings obstruct a thorough 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.

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The absence of an assessment regarding dark skies and nocturnal wildlife within the Environmental Impact Assessment represents a significant evidential gap. The West Lewis coastline is known for its exceptionally dark skies, which contribute to environmental quality, cultural identity, and the tourism sector. The proposal introduces permanent red aviation lighting that will be visible over extensive distances, leading to 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 both residents and visitors. This lack of consideration is particularly concerning given the significance of dark skies to the area’s identity and the emerging sectors of astro-tourism. The omission of these impacts leads to a critical gap in the overall landscape and environmental assessment.

Furthermore, there is no evaluation regarding the effects of artificial lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel exhibit high sensitivity to artificial lighting due to phototaxis, which

can result in disorientation and an increased risk of collision. The application does not present any lighting impact assessment or phototaxis study, thereby failing to determine how aviation lighting may influence these species or potentially increase mortality rates.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or the associated risks. Additionally, species such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this risk has not been addressed. The absence of site-specific night-time data creates a substantial gap in understanding the ecological impacts.

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

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

In summary, the lack of assessment of 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 unable to support a lawful determination.

## SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development when evaluated against legal obligations, national policy, and evidence standards. This application mirrors the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was noted. It is presented now under a more robust policy framework that places additional emphasis on biodiversity, peatland protection, landscape integrity, and the wellbeing of the community.

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

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

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

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

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

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

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

**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: DAC862CA

**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 relevant marine licensing and Environmental Impact Assessment processes. A careful review of the Environmental Impact Assessment Report and accompanying documents reveals significant deficiencies across planning, environmental, cultural, and procedural aspects. Located off the west side of the Isle of Lewis, this area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of the proposal, combined with its proximity to the shoreline, lead to serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis required for a lawful determination. There are critical gaps in environmental data, with limited and inconsistent baseline information, leaving many key aspects of the proposal undefined. The flexible design framework employed means that the potential significant effects cannot be clearly understood, while the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documents fail to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects are unsupported by robust evidence.

In addition, there are significant policy conflicts evident within the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent and weaken the competent authority's ability to determine the proposal as acceptable from a policy standpoint.

The unprecedented scale of the proposed wind farm, with large turbines situated close to the shoreline, raises serious issues relating to landscape capacity, visual impact, and overall environmental consequences. Collectively, the insufficiency of information, reliance on undefined mitigation, evidential weaknesses, and clear non-compliance with policy illustrate that the application is incomplete and unfit for lawful determination. In light of these circumstances, it is essential that the precautionary principle is applied.

**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 contains significant flaws and inconsistencies that undermine its credibility. It fails to provide adequate evidence that

the internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline, will remain unaffected. The area is vital foraging ground and includes key migratory pathways, yet the assessment does not thoroughly analyse potential impacts related to displacement, collision risk, or habitat loss.

Notably, the developer presents contradictory conclusions; while asserting there will be no significant adverse effects, they simultaneously put forward a Habitats Regulations derogation case, which is only necessary when there is an expectation of significant harm. This contradiction raises serious concerns about the assessment's reliability and suggests that its conclusions lack support from the evidence presented.

The methodologies employed in the assessment are questionable, particularly as they appear to underestimate mortality rates, especially for species such as Kittiwakes and Fulmars that are in severe decline. The insufficient evidence regarding seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, is concerning, particularly as the significance of these feeding grounds is not fully addressed. Furthermore, the use of modelling approaches introduces uncertainty, especially given that baseline data is incomplete and species behaviour is not fully understood.

The location of turbines within a recognised migratory corridor poses an additional risk, as it effectively creates a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of potential sustained mortality in this corridor are not adequately assessed, nor are the effects on species with relatively small global populations.

Regulatory considerations indicate that the application does not meet the evidential standards required to conclude that there will be no adverse effects on the integrity of protected sites. The presence of inconsistencies, along with gaps in data and limitations in modelling, means that the conclusion has not reached the standard of being beyond reasonable scientific doubt. This situation invokes the precautionary principle and undermines the legitimacy of any consent granted.

Moreover, these deficiencies result in a lack of 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.

Collectively, the assessment is marked by internal inconsistency, methodological weaknesses, and a lack of sufficient evidence. These issues hinder a comprehensive evaluation of the potential impacts and affirm that the application does not satisfy the statutory requirements necessary for a positive determination.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The proposed development raises serious concerns regarding the assessment of social impacts, health, and wellbeing, which is significantly inadequate and lacks the

necessary transparency for a lawful evaluation. Although the developer has commissioned a Social Impact Assessment that involved focus groups with local residents, the full report remains unpublished. This creates a substantial evidential gap that hinders both the public and the competent authority from comprehending the extent of social risks revealed by the developer's own research.

Available summaries suggest that residents are already suffering from measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These effects arise from direct engagement and are not speculative in nature. However, without disclosing the complete assessment, there is an inability to scrutinise the findings adequately, which limits the capacity to gauge their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with the term “cultural loss” noted within the developer’s own findings. Despite this recognition, these impacts have not been fully integrated into the main application nor given the appropriate weight they deserve. The omission of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency severely undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly where community character and functioning may be at stake. The absence of the complete dataset means that the application does not provide a solid evidential foundation for assessing the balance between potential benefits and harms.

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 harm, yet the evidence currently available points to existing adverse effects that remain undisclosed. Without access to the full assessment, compliance with this policy cannot be established.

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. This omission represents a material shortcoming within the application and fails to satisfy the evidential requirements mandated by the Environmental Impact Assessment regime.

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

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The proposed development fails to provide an adequate assessment of seascape, landscape, and visual impacts, which undermines the true scale of change and sensitivity of the environment in question. The character of the West Lewis coastline is marked by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The installation of large-scale turbines in close proximity to the shoreline would lead to a significant industrial presence that would fundamentally alter this character, resulting in a permanent and irreversible transformation of the landscape.

Furthermore, the application does not accurately convey the extent of visual change that would occur. The size and closeness of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. This serious level of impact has not been properly represented within the assessment, particularly given the sensitivity of the landscape.

There are also significant methodological issues concerning the choice and presentation of visual viewpoints. It appears that the selected viewpoints may not adequately capture the most sensitive receptors or worst-case scenarios, especially concerning important cultural heritage sites and high-value landscapes. This raises concerns that the true scale of visual impact may be understated, which in turn compromises the reliability of the assessment.

Moreover, the application neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to the surrounding landscape, with visual and spatial relationships to the Atlantic horizon. By treating these sites as isolated entities, the assessment fails to acknowledge their interdependence, leading to an incomplete understanding of the impact on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are experienced and severing their connection to the natural horizon. This constitutes not only a visual concern but a wider cultural and spatial detriment that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal directly contradicts the principles outlined in National Planning Framework 4, which emphasises the importance of safeguarding natural environments and historical assets. The scale of change proposed is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further diminishes any assertions of policy conformity.

Ultimately, the identified impacts are not amenable to effective mitigation. Given the size, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. The change would thus be fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation measures.

In summary, the assessment falls short in accurately portraying the scale of impact, the

sensitivity of the environment, and the interconnected relationships between landscape and heritage. These shortcomings hinder a reliable evaluation and support the conclusion that the proposal does not align with the need to protect this significant landscape.

## **FISHERIES AND MARINE LIFE**

The assessment concerning marine life and fisheries lacks the necessary depth and fails to adequately evaluate the ecological and socio-economic impacts involved. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry. However, the application does not sufficiently demonstrate how these vital uses and habitats will be protected or preserved without causing significant disruption.

One critical concern is the flawed assumption that fishing activities can be relocated without any repercussions. The application lacks evidence to support the availability or accessibility of alternative fishing grounds that could handle the additional pressure. This gap in information is troubling, as displacing fishing efforts may lead to overfishing in other areas and could have broader economic repercussions for the local fishing fleet. An evidence-based assessment is essential for a clear understanding of the impacts on both fisheries and local livelihoods.

Moreover, the proposal poses substantial risks to marine species, particularly due to the underwater noise produced during the construction phase. Extended high-energy hammer piling is anticipated to disturb marine life over considerable distances, with species like dolphins being particularly affected. The expected impact on a significant proportion of the local bottlenose dolphin population is alarming, yet the application tends to minimise these effects, lacking sufficient supporting evidence.

There is a notable inconsistency within the application regarding the need for licenses to allow harm to European Protected Species, while simultaneously describing these impacts as negligible. This contradiction casts doubt on the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially in situations where harm is expected to such an extent that it necessitates legal authorisation.

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

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

In summary, the deficiencies present in the assessment—specifically the absence of evidence concerning fishing displacement, the minimisation of acoustic impacts, and internal contradictions—render the evaluation incomplete and unreliable. These shortcomings obstruct a comprehensive understanding of the implications for marine life and fisheries.

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

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

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

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

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

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

From a policy standpoint, the disjointed assessment of the project and the failure to safeguard peatlands, habitats, and land use interests are at odds with the National

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

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

## SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the essential criteria of sustainable development when evaluated against legal obligations, national policies, and evidence-based standards. It echoes the central concerns that led to the denial of the Lewis Wind Power proposal in 2008, which deemed the level of industrialisation unacceptable. This current application, however, comes under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A reliable evidential basis for determining the application is lacking. There are substantial gaps in baseline data, the use of an unclear design envelope, unarticulated reliance on mitigation measures, and the exclusion of critical impact pathways such as nocturnal wildlife, complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment remains incomplete, hindering a full understanding of the likely significant effects or residual impacts.

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

In addition, the proposal contradicts National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural environments, and cultural heritage, fails to illustrate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Furthermore, the cumulative impact of both offshore and onshore components has not been appropriately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

There are unresolved environmental risks that remain uncertain and potentially serious. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The necessary evidential threshold to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

The proposal 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 connections, and the negative impacts on tourism are permanent effects that cannot be effectively mitigated.

In summary, the application is procedurally and substantively inadequate for determination. The magnitude of information deficiencies, coupled with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must either refuse consent based on these grounds or utilise the relevant regulatory provisions to mandate the submission of the missing information.

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

### **Additional Comments**

I OBJECT to the proposed Spiorad Na Mara windfarm.

1. The height of each individual turbine will be seen across a considerable part of Lewis, which at present has a wildness which should be preserved, not destroyed.
  2. The site of the proposed turbines sits within an area of sea that is rich in marine life. It is essential that these sites are protected and not destroyed. The area is a known migratory route of large marine mammals and the positioning of turbines here will obstruct these routes. This area should not be used for industrial turbines.
  3. The land base area will destroy the natural peat, releasing more CO<sub>2</sub>.
  4. The decrease in mental health due to the stress of having the natural environment which Lewis and her marine environment are famous for.
- Please do not allow this industrialisation to go 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: 33DF43A3

**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 lacks essential transparency and reliability in its account of the likely environmental effects associated with the proposal. It employs a flexible Project Design Envelope, which does not commit to

specific turbine dimensions, layouts, or configurations, leading to considerable uncertainty. This lack of certainty compromises the integrity of the assessment and obscures the actual environmental impacts that may arise from the development. As a result, both the public and the competent authority are left without a clear understanding of the true extent of these effects.

Furthermore, the application depends significantly on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that any environmental harm will be addressed later prevents a thorough evaluation of the potential effectiveness of these measures and an assessment of residual impacts. This approach defers crucial information to stages following consent, which is procedurally inappropriate and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before a decision is made.

There are notable evidential deficiencies present, such as gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. These shortcomings lead to uncertainty about the scale and significance of the impacts, particularly when negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information hampers a comprehensive understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to comply with statutory requirements.

Consequently, the application does not satisfy the evidential threshold stipulated under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, particularly in relation to the safeguarding of biodiversity and environmental integrity, as it cannot adequately show that impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the deficiencies arising from the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data culminate in an Environmental Impact Assessment Report that is both unreliable and incomplete. These issues hinder a lawful and rigorous assessment 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 proposed assessment of marine ecology and protected species is fundamentally deficient, failing to deliver a comprehensive or dependable understanding of ecological receptors in the West Lewis coastal environment. This marine system is recognised for its biological sensitivity and 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 assessment lacks a solid

evidential basis to evaluate potential impacts.

One significant oversight is the treatment of otters, classified as a European Protected Species. The application does not appropriately acknowledge or assess their active utilisation of coastal areas for foraging and movement. This lack of consideration for their core foraging range and behavioural patterns means that potential impacts from construction disturbance, noise, and increased activity have not been sufficiently evaluated. As a result, any conclusions drawn about the absence of significant effects on otters are fundamentally undermined.

Additionally, there are notable deficiencies in the assessment of basking sharks, which are exacerbated by reliance on aerial surveys that introduce significant detection bias, particularly under Atlantic conditions. This method is likely to underreport the species' presence, especially when compared to established land-based observations that demonstrate frequent use of these waters. The failure to properly incorporate or consider such data contributes to an incomplete baseline, further weakening the reliability of the conclusions drawn.

The limitations of the methodologies employed result in conclusions regarding negligible or non-significant effects being derived from assumptions rather than robust evidence. Moreover, the absence of adequate baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This lack of clarity raises concerns about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4. The proper identification and assessment of protected species have not been conducted, creating a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby engaging the precautionary principle. Under these circumstances, lawful consent cannot be granted.

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

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The assessment of the proposed development presents significant flaws that undermine its conclusions, particularly concerning the severe decline of seabird populations on the west coast of the Isle of Lewis, which are internationally important. The application fails to provide the necessary evidence to demonstrate that these species will not be adversely affected, especially given that it is situated within critical foraging areas and migratory pathways. Important risks such as displacement, collision, and habitat loss have not been adequately evaluated.

A critical inconsistency arises within the application, where the developer claims no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which should only be necessary when significant harm is anticipated. This contradiction casts doubt on the credibility of the assessment, revealing that its conclusions lack support from solid evidence. The study does not adequately protect seabirds linked to designated sites, including the Lewis Peatlands and St Kilda, failing to fully account for the significance of these feeding grounds. The reliance on modelling further introduces uncertainty, particularly regarding species like Kittiwakes and Fulmars, which are in sharp decline. Methodologies employed are likely to underestimate mortality rates, particularly due to incomplete baseline data and a lack of understanding regarding behavioural responses.

Additionally, the placement of turbines within an established migratory corridor poses an alarming risk by creating an obstacle along a primary flight path used by birds migrating between the United Kingdom and Iceland. The application does not sufficiently consider the long-term implications of persistent mortality within this corridor or the potential effects on species with small global populations.

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

Moreover, the identified deficiencies reflect a failure to adhere to the National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to show that internationally significant seabird populations will not be adversely affected directly conflicts with national policy.

Overall, the assessment's reliability is compromised by internal contradictions, methodological flaws, and insufficient evidence. These issues hinder a thorough evaluation of the impacts and affirm that the application does not satisfy the legal requirements necessary for determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The evaluation of community identity and cultural heritage in relation to the proposed development is fundamentally flawed, as it overlooks the West Lewis coastline's significance as a dynamic cultural landscape. This landscape is characterised by an intricate connection between the environment, language, tradition, and the community itself. Unfortunately, the application simplifies heritage into isolated, static entities, neglecting their ongoing social, cultural, and spiritual roles within the community.

Particularly concerning is the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, which are vital places for burial and

spiritual practice. The assessment reduces these active sites to mere static features, ignoring their continued use and the implications of development on their surroundings. This failure leads to an inadequate evaluation of cultural impacts and disregards their importance to community life.

Moreover, the assessment neglects to consider intangible cultural heritage, such as the Gaelic language and traditions, along with the deep-rooted relationship between the community and the coastal environment. These elements are vital to the area's identity yet are completely omitted from the evaluation, representing a substantial oversight. Without acknowledging these factors, the true cultural impact of the proposed development remains obscured.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies a distinct cultural identity akin to that of Indigenous Peoples, has not been afforded the necessary process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and fails to adhere to recognised principles of participation in decisions that affect cultural and environmental interests.

A serious procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, a requirement under the Islands (Scotland) Act 2018. In the absence of this assessment, the relevant authority cannot adequately fulfil its legal obligations to consider the social, cultural, and economic effects on the island community. This alone renders a lawful determination impossible.

From a policy standpoint, these oversights put the proposal at odds with National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, as well as the failure to recognise living cultural practices, represents a significant deviation from policy standards.

In summary, the deficiencies in assessing living heritage, intangible cultural value, community rights, and adherence to statutory requirements create a substantial evidential gap. The cultural ramifications of the development have not been appropriately examined, and the application lacks a solid foundation for evaluating the genuine cultural cost associated with the proposal.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The transparency surrounding the assessment of social impacts, health, and wellbeing is severely lacking, leading to significant concerns about the adequacy of the evaluation. Although the developer engaged in a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This gap in evidence restricts both public insight and the competent authority's understanding of the social risks highlighted in the developer's own research.

Local residents are already feeling measurable stress, anxiety, and worry due to the

scale and proximity of the proposed development. These effects are based on direct engagement with the community and are not speculative. However, the absence of the complete assessment hampers thorough scrutiny of the findings and limits the ability to evaluate their importance in the decision-making process.

Moreover, there is a perception among community members that the proposal threatens their identity and cohesion, with indications of "cultural loss" appearing in the developer's findings. Unfortunately, these impacts have not been adequately considered in the main application, nor have they been given the weight they deserve. The decision to withhold the full Social Impact Assessment conceals the actual human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. Understanding the social, economic, and health impacts is vital for developments of this magnitude, especially when community character and functioning are at stake. Without the complete dataset, the application fails to provide a solid evidential foundation for weighing the benefits against the potential harm.

From a policy standpoint, the application falls short of demonstrating adherence to National Planning Framework 4 concerning health and wellbeing. Development should foster positive health outcomes and mitigate harm; however, the evidence currently suggests pre-existing adverse effects that have not been adequately disclosed. Therefore, without the full assessment, it is impossible to confirm compliance with this policy.

The implications for procedure are significant, as the competent authority cannot perform a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This represents a material omission in the application and a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

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

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The assessment of seascape, landscape, and visual impacts presented in the application is significantly lacking and does not truly reflect the degree of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its open Atlantic horizon, undeveloped nature, and a pronounced sense of remoteness. The proposed large-scale turbines, positioned near the shoreline, would impose a continuous and intrusive industrial presence, leading to a fundamental alteration of this character and a permanent, irreversible transformation of the landscape.

There are significant methodological flaws in the selection and representation of visual

viewpoints. Current evidence indicates that these viewpoints may not fully capture the most sensitive receptors or the worst-case scenarios, particularly regarding important cultural heritage sites and high-value landscapes. This raises concerns about the possibility that the visual impact has been understated, thereby casting doubt on the reliability of the assessment.

Additionally, the assessment neglects to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Key sites, such as the Calanais Standing Stones and other Scheduled Monuments, form part of a broader landscape context that is visually and spatially linked to the Atlantic horizon. The current evaluation treats these heritage assets in isolation, failing to acknowledge their interdependence and leading to an incomplete understanding of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these vital connections, altering how heritage assets are perceived and severing their ties to the natural horizon. This not only represents a visual impact but also inflicts a more extensive cultural and spatial harm that has not been adequately addressed in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly concerning the preservation of natural areas and historical assets. The level of change proposed is fundamentally incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case scenario assessment further undermines any assertion of policy compliance.

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

In summary, the assessment fails to provide an accurate representation of the scale of impact, the sensitivity of the environment, and the interconnected nature of the landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal does not align with the necessary protections for this landscape.

## **CONSTRUCTION AND POLLUTION RISKS**

The assessment regarding construction and pollution risks is inadequate, lacking the necessary detail to evaluate the potential environmental effects associated with the proposal. This initiative entails significant seabed preparation and installation activities within a high-energy Atlantic environment, yet it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it leans on mitigation and contingency measures that would only be formulated after consent has been granted, thereby obstructing any meaningful assessment of their

adequacy or effectiveness.

This reliance on unspecified future measures raises serious concerns, particularly considering the sensitivity of the receiving environment. The coastline of West Lewis is home to clean coastal waters and critical habitats that are at risk of sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide adequate details on how these risks will be prevented, controlled, or monitored.

Moreover, there is uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and well-defined management strategies, determining the extent, duration, or ecological consequences of these impacts is unfeasible. This uncertainty also applies to potential effects on marine species and habitats already identified as sensitive within the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a post-consent phase, the application hampers the evaluation of whether adequate safeguards are in place to address pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant likely effects and mitigation strategies must be evaluated prior to granting consent, and without this information, a lawful determination cannot be achieved. The application also fails to illustrate compliance with policy requirements regarding environmental protection and water quality.

Overall, the absence of clearly defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts render the assessment fundamentally deficient. These shortcomings impede a thorough 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 vibrant marine ecosystem and support an active fishing industry. However, the application does not provide a robust evaluation of the ecological or socio-economic impacts on these critical resources. A significant concern is the flawed assumption that fishing activity can be moved without consequences. There is no evidence presented that alternative fishing grounds are available or capable of absorbing additional pressures, which is vital information. This lack of clarity poses a risk of overfishing in other areas and could have severe economic repercussions for the local fishing fleet. An evidence-based assessment is essential to understand the true impacts on fisheries and livelihoods.

The proposal also presents considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over prolonged periods is expected to create disturbances that could affect marine life over large distances, including local dolphins. The predicted disruption to a significant portion of the local bottlenose dolphin population raises alarming questions, yet the application minimises the importance of these potential effects without adequate supporting evidence.

There is a troubling inconsistency in the application itself, acknowledging the need for licences to allow harm to European Protected Species while simultaneously claiming that the impacts are negligible. This contradiction undermines the validity of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially when harm is anticipated to an extent that would require legal authorisation.

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

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

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

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The application fails to provide a thorough assessment of onshore infrastructure, which is crucial for understanding the full extent of the impacts resulting from this single integrated project. The offshore turbines and onshore works are closely interconnected; however, they have been evaluated separately, leading to a fragmented approach that obscures the overall environmental and socio-economic effects.

Key onshore elements include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These undertakings involve excavation in areas of deep peat, notably within Barvas Moor, a significant carbon store and ecologically sensitive habitat. The lack of a comprehensive assessment of these impacts hampers the ability to grasp the project's entire environmental footprint.

By neglecting or postponing the assessment of onshore impacts, the application hinders the proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates the consideration of all project components in conjunction; however, the distinct separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are inadequately understood.

There are also considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application has not demonstrated that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been taken, revealing a significant evidential gap regarding biodiversity protection.

Concerns surrounding carbon balance also arise from the proposal. The disturbance of peatland leads to the release of stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application inadequately addresses this critical issue and fails to show that the overall carbon balance remains positive.

Furthermore, the routing of infrastructure through active croft land presents possible conflicts with established land use and legal rights. The application does not provide evidence that the required consents or processes have been initiated, which raises doubts about the project's deliverability and lawful implementation.

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 is in conflict with the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further diminishes the application's credibility.

In summary, the separation of project components, the lack of a comprehensive assessment, and the absence of supporting evidence regarding environmental and land use impacts result in this part of the application being incomplete and unreliable, preventing a lawful determination.

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The Environmental Impact Assessment for this proposal fails to address critical aspects regarding dark skies and nocturnal wildlife, representing a significant omission. The West Lewis coastline is noted for its exceptionally dark skies, which contribute to environmental quality, cultural identity, and tourism value. However, the introduction of permanent red aviation lighting, which is visible over extensive distances, would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

The application lacks an evaluation of the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This is

particularly concerning given the role of dark skies in the area's identity and the emerging astro-tourism sector. The absence of such an assessment indicates a clear gap in the landscape and environmental evaluation.

Moreover, the assessment does not consider the impacts on nocturnal wildlife, including sensitive species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are affected by artificial lighting due to phototaxis. This can lead to disorientation and increased risks of collision. The application does not include any lighting impact assessment or phototaxis study, thereby failing to evaluate how the proposed aviation lighting could affect these species and potentially increase mortality rates.

The situation is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which neglects nocturnal activity and its associated risks. Kittiwakes, for example, may forage or migrate at night and are similarly susceptible to disorientation from artificial lighting, yet this risk remains unassessed. The lack of site-specific night-time data creates a significant gap in understanding ecological impacts.

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

From a policy perspective, these omissions conflict with the National Planning Framework 4, which emphasises the importance of protecting natural places and maintaining environmental quality. This gap in assessment also undermines the overall evaluation of landscape and seascape impacts, as the character of night-time environments is integral to the broader ecological framework.

In conclusion, the absence of any assessment related to dark skies and nocturnal wildlife creates a significant evidential shortfall. The lack of baseline data, impact modelling, and species-specific analysis results in an application that is incomplete and inadequate for supporting a lawful determination.

## **SUMMARY**

The application for the Spiorad na Mara Offshore Wind Farm reflects a significant failure to meet the criteria of sustainable development when evaluated against statutory duties, national policy, and evidential requirements. It mirrors the critical issues associated with the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new proposal is presented within a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

Fundamental to the assessment process is the lack of a comprehensive and reliable evidential foundation. The application reveals notable deficiencies in baseline data and

continues to rely on an undefined design envelope. Moreover, it depends on mitigation measures that remain unspecified and fails to account for significant impact pathways, such as those related to nocturnal wildlife, complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate, obstructing a thorough understanding of probable significant effects or residual impacts.

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

Furthermore, the proposal conflicts directly with National Planning Framework 4. It fails to demonstrate adequate protection of biodiversity, natural spaces, and cultural heritage, does not substantiate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit owing to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been properly evaluated, thereby obscuring consequences for peatlands, carbon balance, habitats, and crofting land.

The environmental risks remain uncertain and could potentially be significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential standard necessary to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion that impacts are acceptable.

Moreover, 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 relationships, and negative impacts on tourism represent enduring effects that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The extent of information deficiencies, coupled with conflicts with policy and unresolved environmental risks, precludes a lawful, evidence-based decision. The competent authority is urged either to deny consent on these grounds or to invoke the appropriate regulatory measures to obtain the missing information.

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

### **Additional Comments**

This is a world with humanity gone mad...electricity production at all costs with no limits for biosphere health -wellbeing-nature value & healthy planet first!! We are in a nature, pollution & global warming crisis and creating more pollution, nature destructive monstrosities at this time and it these places is pure insanity surely...

**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: AC449C34

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

**Dear Sir/Madam**

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

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

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

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

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report lacks the necessary detail and transparency to provide a reliable account of the likely environmental effects of the proposed development. A flexible Project Design Envelope is employed, which does not

commit to specific dimensions, layouts, or configurations of the turbines. This introduces considerable uncertainty and hinders the ability to apply a worst-case scenario consistently. As a result, the assessment's integrity is compromised, making it difficult for both the public and the competent authority to grasp the true environmental impacts of the development.

The application relies on mitigation measures, monitoring strategies, and management plans that are yet to be defined. Seeking consent under these conditions means that any potential environmental harm is to be addressed at a later stage, which obstructs a meaningful evaluation of effectiveness or an assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

Additionally, there are notable evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are reached without robust supporting data. The lack of sufficient information inhibits a clear understanding of cumulative and worst-case impacts, creating scientific uncertainty that conflicts 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. The precautionary principle must be invoked, particularly regarding 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 cannot be shown that impacts have been thoroughly assessed or that appropriate safeguards are implemented.

In summary, the combination of an undefined design envelope, the lack of specified mitigation measures, and the gaps in baseline data results in an unreliable and incomplete Environmental Impact Assessment Report. These deficiencies prevent a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to determine the application based on the information provided.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The application fails to provide a reliable understanding of ecological receptors within the West Lewis coastal environment due to a materially deficient assessment of marine ecology and protected species. This area is recognised as a highly sensitive and biologically active marine system, yet the baseline data presented is incomplete. The methodologies employed do not adequately capture crucial information about species presence, behaviour, and habitat use, resulting in an insufficient evidential basis for evaluating potential impacts.

A significant omission in the assessment relates to otters, classified as a European Protected Species. The application does not appropriately recognise or assess the active use of coastal areas by otters for foraging and movement. The oversight of their core foraging range and behavioural patterns means that potential effects arising from construction disturbance, noise, and increased activity have not been sufficiently evaluated. This deficiency undermines any conclusions regarding the absence of significant effects on this species.

In addition, the assessment of basking sharks is flawed due to the reliance on aerial surveys, which introduces significant detection bias, particularly under Atlantic conditions. Such an approach is likely to lead to an underestimation of their presence, especially in contrast to established land-based observations that indicate a frequent utilisation of these waters. The failure to incorporate or appropriately consider this data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

As a result of these methodological shortcomings, any conclusions asserting negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of sufficient baseline data also hinders meaningful assessments of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This creates uncertainty regarding the true scale of risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4, as the identification and assessment of protected species have not been conducted properly. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, consent cannot be lawfully granted.

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

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with the application is flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. It fails to demonstrate to the required evidential standard that these species will not be adversely affected. Key foraging areas and migratory pathways have been identified in the development site, yet the assessment does not adequately evaluate the implications of potential displacement, collision risk, or habitat loss for these birds.

A fundamental contradiction exists in the application, where the developer claims there

are no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which is typically necessary only if significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment, suggesting that the conclusions drawn are unsupported by the evidence presented. Furthermore, there is insufficient evidence regarding the potential impact on seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda. The assessment does not fully account for the significance of these feeding grounds, and the use of modelling approaches introduces additional uncertainty, particularly for species experiencing severe decline like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Moreover, the placement of turbines within a recognised migratory corridor creates a significant risk by effectively constructing a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application has not properly assessed the long-term implications of sustained mortality in this corridor or the potential effects on species that have 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 conclusions, combined with data deficiencies and limitations in modelling, indicates that the standard of proof beyond reasonable scientific doubt has not been satisfied. This situation invokes the precautionary principle, hindering a lawful conclusion in favour of consent.

Additionally, the identified deficiencies signify a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal at odds with national policy. In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence, all of which preclude a robust evaluation of impacts and lead to the conclusion that the application does not fulfil the statutory requirements necessary for a valid determination.

## **CONSTRUCTION AND POLLUTION RISKS**

The assessment of construction and pollution risks associated with the proposal is inadequate, failing to provide essential details needed to evaluate likely environmental effects. The project entails considerable seabed preparation and installation works in a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that will be formulated after consent is granted, which hinders any meaningful assessment of their potential adequacy or effectiveness.

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

features clean coastal waters and vital habitats that are at risk of damage from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate details on how these issues will be prevented, controlled, or monitored.

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

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent is received, the application prevents a proper evaluation of whether suitable safeguards are in place to respond to pollution incidents. This creates procedural risks and undermines the capacity of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Assessments of likely significant effects and mitigation must be conducted prior to granting consent, and in the absence of such information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, the absence of detailed management plans, and the uncertainties regarding potential impacts collectively render the assessment materially deficient. These issues obstruct a thorough evaluation of construction and pollution risks and further reinforce the conclusion that the application is incomplete.

## **FISHERIES AND MARINE LIFE**

The proposal raises significant concerns regarding the assessment of fisheries and marine life, which lacks a thorough evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast, known for their diverse marine ecosystem and active fishing industry, face potential threats from the proposed development. The application fails to ensure that these habitats and livelihoods will be protected or maintained without considerable disruption.

One major issue is the underlying assumption that fishing activities can be displaced without any repercussions. The application does not provide evidence that alternative fishing grounds are available or can adequately accommodate the displaced activity. This gap is critical, as such displacement could lead to overfishing in other areas and have broader economic ramifications for the local fishing fleet. The absence of a clear,

evidence-based assessment makes it impossible to understand the true impacts on fisheries and local livelihoods.

Moreover, the proposal poses serious risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over a prolonged period is expected to disturb marine life over extensive distances, notably affecting species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming; however, the application downplays these effects without adequate evidence to support such minimisation.

There is an evident inconsistency in the application, where the necessity for licences to permit harm to European Protected Species is acknowledged, while simultaneously declaring the impacts as negligible. This contradiction compromises the credibility of the assessment and raises questions about compliance with the Habitats Regulations, particularly concerning anticipated harm that would necessitate legal authorisation.

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

From a policy perspective, the application does not demonstrate adherence to 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 hinders any conclusion that the proposal signifies sustainable development.

Overall, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies culminate in an assessment that is incomplete and unreliable. These shortcomings obstruct a robust evaluation of the impacts on marine life and fisheries.

## **SUMMARY**

The proposal for the Spiorad na Mara Offshore Wind Farm exemplifies a significant failure to meet the standards of sustainable development as mandated by statutory duties and national policy. It mirrors the core problems that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite the current application being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

Crucially, the application lacks a comprehensive and reliable evidential basis. It contains significant gaps in baseline data, utilises an undefined design envelope, and depends on unspecified mitigation measures. Additionally, it omits vital impact pathways, including nocturnal wildlife, the full scope of onshore infrastructure, and the

implications for tourism. Consequently, the Environmental Impact Assessment is insufficient, leaving the potential significant effects and residual impacts inadequately understood.

There are also evident procedural shortcomings. The failure to provide a compliant Island Communities Impact Assessment violates statutory duties under the Islands (Scotland) Act 2018, while the omission of a complete Social Impact Assessment constitutes a critical gap. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal 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 validate that health and wellbeing impacts are acceptable. Furthermore, it fails to show a net economic benefit because of the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly evaluated, thus obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties persist regarding environmental risks, which could be significant. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and prevents a lawful conclusion regarding acceptable impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The myriad information deficiencies, paired with conflicts in policy and unresolved environmental risks, obstruct any lawful and evidence-based decision-making. The competent authority must therefore refuse consent on these grounds or invoke the relevant regulatory provisions to mandate the submission of the outstanding information.

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

### **Additional Comments**

The scale of these turbines is beyond belief. The premise behind them is not environmental, it is to line the pockets of foreign investors to the detriment of the lives of the animals who have been in the region for millenia. This greed and disrespect for the natural world must be halted.

**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: D5383D12

**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 Environmental Impact Assessment Report exhibits significant shortcomings and fails to deliver a comprehensive, transparent, or dependable evaluation of the anticipated environmental impacts associated with the proposal. The incorporation of a flexible Project Design Envelope, lacking specific commitments to turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty inhibits the application of a worst-case scenario, thereby compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development that will ultimately be realised, hindering both public understanding and the competent authority's capacity to comprehend the true extent of environmental effects.

Additionally, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have yet to be articulated. The request for consent is predicated on the assumption that environmental harm will be mitigated at a later date, which undermines the ability to thoroughly evaluate the effectiveness of such measures or assess any residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies be clearly defined prior to any determination.

Moreover, there are notable deficiencies in the evidential basis, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty concerning the magnitude and significance of impacts, particularly when conclusions of negligible or non-significant effects are reached without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

As a result, the application does not satisfy the evidential requirements set forth by the Habitats Regulations, which necessitate the exclusion of adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially in regard to protected species and sensitive habitats. The proposal also falls short of demonstrating compliance with National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it remains unclear whether impacts have been fully evaluated or if appropriate safeguards have been established.

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 obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information provided.

## **ASSESSMENT OF ALTERNATIVES**

The application fails to provide a structured and evidence-based assessment of alternatives, which is crucial under the Environmental Impact Assessment regime. Rather than presenting a reasoned comparison of viable alternatives based on their environmental impacts, it offers a narrative focused on the project's development. This narrative does not sufficiently show that the developer has adequately identified and evaluated less harmful options in favour of those that are more damaging.

There is a lack of transparent analysis concerning alternative offshore locations, various scales of development, and potential design configurations. Notably, the application does not indicate that the developer has genuinely considered placing the turbines further offshore, an action that could mitigate visual, ecological, and coastal effects. Considering the sensitivity of the West Lewis coastline, the failure to address the importance of distance from shore in assessing impacts prevents a determination that the proposed site is the least damaging option available.

Moreover, the shortcomings extend to the routing of cables and the assessment of landfall sites, where there is inadequate evidence that alternative routes have been thoroughly examined to lessen impacts on sensitive receptors, including areas of cultural significance such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis suggest a failure to apply mitigation by design, relying instead on post-design measures that may not be effective.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout planning, and infrastructure routing. This indicates a disregard for the established mitigation hierarchy, leaving the competent authority unable to ascertain whether there are more appropriate and less harmful alternatives. Without a comprehensive assessment of alternatives, it is impossible to assert that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, these deficiencies undermine adherence to National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a systematic and comparative assessment represents a significant omission, contributing to the overarching conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The assessment of marine ecology and protected species within the West Lewis coastal environment is 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 proposal for development on the west coast of the Isle of Lewis raises significant concerns regarding its impact on internationally important seabird populations, many of which are already in decline. The ornithological assessment associated with this application is flawed, featuring considerable gaps in evidence and inconsistencies that compromise its conclusions. Key foraging areas and migratory pathways for seabirds are located within the proposed development site, yet the assessment fails to adequately evaluate the potential implications of displacement, collision risk, or habitat loss.

There is a critical contradiction in the application, where the developer concludes that

no significant adverse effects are anticipated while simultaneously making a Habitats Regulations derogation case, which is typically invoked only when significant harm is expected. This inconsistency raises doubts about the reliability of the assessment and suggests that its conclusions are not substantiated by the necessary evidence. The evaluation does not sufficiently demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected, and it inadequately considers the importance of these feeding grounds. Furthermore, the reliance on modelling methods introduces uncertainty, particularly for species facing severe declines, like Kittiwakes and Fulmars, with the methodologies likely to underestimate mortality due to incomplete baseline data and insufficient understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor creates a significant risk by obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not thoroughly investigate the long-term consequences of sustained mortality within this corridor or the potential repercussions for species that have relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effects on the integrity of protected sites. The combination of contradictory findings, data deficiencies, and modelling limitations indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This engages the precautionary principle and renders any conclusion in favour of consent unlawful. The identified deficiencies also signify non-compliance with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to prove that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

Overall, the assessment is unreliable due to internal inconsistencies, methodological flaws, and inadequate evidence. These shortcomings hinder a thorough evaluation of potential impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The developer's failure to publish the complete Social Impact Assessment fundamentally undermines the assessment of social impacts, health, and wellbeing. This lack of transparency represents a significant evidential gap, leaving both the public and the competent authority unable to grasp the full extent of the social risks identified through the developer's own research. Despite the commissioning of this assessment and focus groups with local residents, the absence of the full report limits scrutiny of its findings and hinders the determination of their relevance in the decision-making process.

Evidence suggests that local residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These

impacts arise from direct engagement rather than speculation; however, without access to the complete assessment, the seriousness of these effects cannot be appropriately considered. Furthermore, the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Yet, these significant impacts have not been adequately integrated into the main application or given the necessary weight.

The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development, which is particularly concerning given the scale of the project. Such a lack of transparency compromises the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is vital when assessing developments that may alter community character and functionality. The failure to provide the full dataset results in an application that does not present a complete evidential basis for evaluating the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development must facilitate positive health outcomes and mitigate harm; however, the evidence available indicates adverse effects that remain undisclosed. Without the full assessment, the application cannot claim compliance with this policy.

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

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The proposal poses significant concerns regarding the interconnected relationship between landscape, seascape, and cultural heritage. Key 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. The assessment treats these heritage assets as isolated, neglecting their interdependence and failing to evaluate the impacts on their setting and cultural significance adequately. The industrialisation of the seascape threatens to sever these connections, altering the context in which these heritage assets are experienced and disrupting their relationship with the natural horizon. This signifies a broader cultural and spatial harm that has not been sufficiently addressed in the application.

The visual impacts identified are particularly concerning. The application does not accurately represent the magnitude of visual change resulting from the introduction of large-scale turbines. Their scale and proximity would dominate views from residential

areas, historic sites, and popular coastal locations, leading to a direct loss of visual amenity. The assessment inadequately conveys the significance of this impact within such a sensitive landscape, undermining the appreciation of naturalness and remoteness which defines the West Lewis coastline, characterised by its open Atlantic horizon and undeveloped nature.

Methodological issues also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not comprehensively reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. Such shortcomings introduce a risk that the visual impact has been understated, casting doubt on the reliability of the assessment's findings.

From a policy standpoint, the proposal is incompatible with National Planning Framework 4 concerning the protection of natural places and historic assets. The scale of proposed changes conflicts with the necessary safeguarding of landscape character, visual amenity, and the setting of culturally significant sites. Moreover, the absence of a robust worst-case assessment further weakens any assertions of compliance with relevant policies.

The overall assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is not aligned with the protection of this landscape. It is evident that the impacts identified cannot be effectively mitigated; the scale, height, and proximity of the turbines would ensure their presence is dominant and unavoidable, leading to a permanent transformation rather than one that could be reduced to an acceptable level through mitigation efforts.

## **CONSTRUCTION AND POLLUTION RISKS**

The absence of detailed management plans and defined mitigation measures leads to a materially deficient assessment of construction and pollution risks. The proposal, which entails substantial seabed preparation and installation works within a high-energy Atlantic environment, does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are set to be prepared after consent, thereby hindering a meaningful evaluation of their adequacy or effectiveness.

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

The proposal also acknowledges risks such as sediment mobilisation and accidental

chemical or oil spills, yet it fails to provide sufficient details on how these risks will be prevented, controlled, or monitored. The sensitivity of the receiving environment, including the West Lewis coastline that supports clean coastal waters and important habitats vulnerable to sediment disturbance and contamination, further heightens these concerns.

Furthermore, the absence of detailed emergency response procedures compounds the issues raised. 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 risk and undermines the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory perspective, this deferral of critical environmental safeguards is inconsistent with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be assessed prior to consent; if such information is lacking, a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the deficiencies identified within the assessment, including the lack of detailed management plans, uncertainty regarding potential impacts, and absence of defined mitigation measures, collectively illustrate that the evaluation of construction and pollution risks is inadequate and further support the assertion that the application is incomplete.

## **FISHERIES AND MARINE LIFE**

The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. The assessment of fisheries and marine life provided by the application is insufficient and does not adequately evaluate the ecological or socio-economic impacts. A crucial issue is the assumption that fishing activity can be displaced without consequence. The application lacks evidence that alternative fishing grounds are available and accessible, which raises concerns about the risk of overfishing and the potential economic ramifications for the local fishing fleet. The absence of a clear, evidence-based assessment hinders a proper understanding of the impacts on fisheries and livelihoods.

Additionally, the proposal poses significant risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling planned for an extended period is expected to cause disturbances over large distances, potentially affecting marine species such as dolphins. The predicted disruption to a significant portion of the local bottlenose dolphin population is alarming, yet the application tends to downplay these effects without sufficient evidence to support such minimisation.

Moreover, the application acknowledges the need for licences to permit harm to

European Protected Species, while simultaneously describing the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises doubts regarding compliance with the Habitats Regulations, especially where anticipated harm is significant enough to require legal authorisation.

Cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activity, are not adequately addressed in the assessment. Without a thorough evaluation of these combined effects, it is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

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

Overall, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions make the assessment incomplete and unreliable. These shortcomings prevent a robust evaluation of impacts on marine life and fisheries.

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The assessment of the project fails to provide a complete picture of the impacts associated with what constitutes a single integrated development. The offshore turbines and onshore works are inherently connected, yet they are evaluated separately, resulting in a fragmented analysis that obscures the actual environmental and socio-economic effects.

Onshore activities include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the establishment of access routes through sensitive landscapes. These operations entail excavation through areas of deep peat, particularly in Barvas Moor, an important carbon store and ecologically delicate habitat. The application lacks a thorough assessment of these implications, hindering a full understanding of the project's overall environmental footprint.

Furthermore, the exclusion or postponement of onshore impact assessments prevents an accurate evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the separation of offshore and onshore aspects obscures the combined impacts on peatlands, habitats, and local communities.

There are serious concerns regarding risks to sensitive habitats, such as machair systems and peatland environments, which have policy protections in place. The application fails to demonstrate that the effects on these ecosystems have been fully evaluated or that suitable avoidance measures are in place, highlighting a significant evidential gap in biodiversity protection.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use rights. The application does not provide sufficient evidence that the necessary consents or processes have been initiated, which leads to concerns about the project's deliverability and lawful execution.

From a policy standpoint, the lack of a holistic assessment and the failure to show protection for peatlands, habitats, and land use interests contradicts the objectives of the National Marine Plan and National Planning Framework 4. The inability to confirm that impacts can be avoided or mitigated further undermines the application.

In summary, the disconnection between project components, the absence of a comprehensive assessment, and the insufficient evidence regarding environmental and land use impacts render this part of the application incomplete and untrustworthy, impeding a lawful determination.

## **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: 398D5209

**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 the relevant marine licensing and Environmental Impact Assessment regimes. The development's location off the west side of the Isle of Lewis is significant, as the area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the compatibility of this proposal with statutory requirements, national policy, and sustainable development principles due to its scale, proximity, and design.

A review of the Environmental Impact Assessment Report reveals that the application lacks an adequate evidential basis for a lawful determination. Missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal hinder a comprehensive understanding of the likely significant effects. The use of a flexible design framework complicates this further, as the reliance on unspecified mitigation measures raises questions about their effectiveness. Consequently, the documentation fails to facilitate a full or informed understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not substantiated by robust evidence.

There are clear policy conflicts evident within the proposal, as it appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. These conflicts particularly relate to biodiversity, natural places, cultural heritage, and health and wellbeing, failing to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such inconsistencies directly affect the statutory tests required for consent, compromising the ability of the competent authority to assess the development's acceptability in policy terms.

The unprecedented scale of the proposal, with large turbines positioned near the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and evident policy non-compliance indicates that the application is incomplete and incapable of supporting a lawful determination. In light of these circumstances, the precautionary principle must be applied.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a complete, transparent, or dependable analysis of the potential environmental consequences of the proposal. The adoption of a flexible Project Design Envelope,

lacking firm commitments to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This ambiguity undermines the assessment's integrity and means that the impacts outlined may not accurately reflect the actual development, hindering both public understanding and the competent authority's ability to gauge the true environmental effects.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that have yet to be established. Seeking consent on the premise that environmental harm will be rectified at a future date obstructs any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally improper and contradicts the intentions of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation must be clearly defined prior to any decision-making.

Significant evidential shortcomings are present, including gaps in baseline data, methodological limitations, and reliance on assumptions in lieu of site-specific evidence. This leads to uncertainty concerning the magnitude and significance of impacts, especially where negligible or non-significant effects are asserted without robust supporting data. A lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

Consequently, the application does not meet the evidential threshold necessary 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 alignment with National Planning Framework 4, including provisions regarding biodiversity protection and environmental integrity, as it is unclear whether impacts have been comprehensively assessed or if adequate safeguards are in place.

Overall, the reliance on an undefined design envelope, the absence of defined mitigation strategies, and the shortcomings in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These issues obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a determination based on the information submitted.

## **ASSESSMENT OF ALTERNATIVES**

The application lacks a comprehensive assessment of alternatives, falling short of the statutory requirements set by the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, it merely presents a narrative of the project's evolution. This method does not adequately demonstrate that less harmful options have been thoroughly identified, assessed, and chosen over more damaging alternatives.

There is a notable absence of transparent and evidence-based comparisons regarding

alternative offshore locations, development scales, or design configurations. Specifically, the application fails to show that the developer has genuinely considered placing turbines further offshore, where visual, ecological, and coastal impacts are likely to be less severe. The sensitivity of the West Lewis coastline, along with the critical importance of proximity to the shore in assessing impact, renders the lack of such analysis a significant shortcoming, inhibiting any conclusion that the proposed siting is the least damaging option.

These deficiencies are apparent in the areas of cable routing and landfall assessment, as there is insufficient evidence to suggest that alternative routes have been properly evaluated to avoid or minimise impacts on sensitive receptors, including culturally and spiritually important sites such as Barvas Cemetery. The failure to establish a clear avoidance strategy and the lack of comparative analysis indicate that mitigation by design has not been applied, relying instead on post-design mitigation measures.

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

From a policy standpoint, these shortcomings undermine compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community well-being. The absence of a structured and comparative assessment represents a material omission that leads to the overall conclusion that the application has not been sufficiently evaluated and cannot be lawfully determined.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The evaluation of marine ecology and protected species lacks sufficient depth and fails to provide a comprehensive or reliable insight into the ecological receptors within the West Lewis coastal environment. This region is a biologically active and sensitive marine ecosystem, yet the baseline data presented is insufficient, and the methodologies employed do not adequately capture the presence, behaviour, or habitat use of key species. Consequently, the assessment does not yield a strong evidential basis for evaluating potential impacts.

One significant gap in the assessment concerns otters, a European Protected Species. The application does not adequately acknowledge or evaluate their active utilisation of coastal areas for foraging and movement. The oversight regarding their core foraging range and behavioural patterns leads to an inadequate assessment of the potential impacts arising from construction disturbance, noise, and heightened activity levels. This omission weakens any conclusions regarding the absence of significant effects on otters.

Additionally, the assessment of basking sharks reveals further shortcomings, as the

reliance on aerial surveys introduces notable detection bias, especially in Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or sufficiently consider such data results in an incomplete baseline, diminishing the reliability of the conclusions drawn.

These methodological issues mean that assertions of negligible or non-significant effects are primarily based on assumptions rather than robust evidence. The lack of adequate baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates ambiguity regarding the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to appropriately identify or assess protected species. The uncertainty introduced by these shortcomings prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. In light of these factors, consent cannot be granted lawfully.

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

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The application is fundamentally flawed in its ornithological assessment, which suffers from significant evidence gaps and internal inconsistencies that compromise its conclusions. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already facing decline. However, the application fails to provide the necessary evidence to show that these species will not be adversely affected. Key foraging areas and migratory pathways are directly impacted by the proposed development, yet the assessment does not thoroughly evaluate critical issues such as displacement, collision risk, or habitat loss.

A serious contradiction is evident in the application, as the developer asserts no significant adverse effects while also arguing a case for Habitats Regulations derogation, a process that is only invoked when significant harm is anticipated. This inconsistency raises doubts about the assessment's reliability and suggests that the conclusions are not substantiated by the evidence presented. Furthermore, the assessment does not adequately demonstrate that seabirds linked to protected sites like the Lewis Peatlands and St Kilda will remain unaffected. The importance of their feeding grounds is not comprehensively addressed, and the reliance on modelling techniques introduces uncertainty, particularly for vulnerable species such as Kittiwakes and Fulmars. The methodologies employed appear likely to underestimate mortality rates, especially when baseline data is incomplete and species behaviours

are not fully understood.

The location of turbines within a recognised migratory corridor poses another serious risk, creating a barrier along a primary flight path for birds migrating between the United Kingdom and Iceland. The application lacks a thorough examination of the long-term consequences of ongoing mortality in this corridor and does not consider the potential impacts on species with relatively small global populations. From a regulatory standpoint, the application fails to meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been met. This triggers the precautionary principle, thus hindering any lawful conclusion that could support consent.

Collectively, these deficiencies represent a significant failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to conclusively demonstrate that internationally important seabird populations will not face adverse effects places the proposal in direct conflict with national policy. Overall, the assessment's unreliability stems from its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence, ultimately leading to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The assessment regarding cultural heritage and community identity is lacking and does not recognise the West Lewis coastline as an active cultural landscape where environment, language, tradition, and community are intertwined. Instead, the application simplifies heritage, viewing it as a collection of isolated, unchanging assets without acknowledging their ongoing social, cultural, and spiritual roles within the community.

Particularly concerning is the way culturally important sites, like the cemeteries at Dalmore, Bragar, and Barvas, are addressed. These sites serve as active places for burial and spiritual practice, yet the assessment reduces them to static elements, neglecting their continued significance and the potential effects of development on their surroundings. This mischaracterisation leads to a partial understanding of cultural impacts and overlooks their importance in community life.

Moreover, the assessment does not take into account intangible cultural heritage such as the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These factors are essential to the area's identity but are missing from the assessment, which is a major oversight. Failing to consider these elements means that the cultural effects of the development cannot be accurately assessed.

There are additional issues surrounding community rights and engagement. The Gaelic-

speaking community possesses a unique cultural identity recognised as that of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement undermines the assessment's validity and does not align with established principles of participation concerning cultural and environmental interests.

A significant procedural gap exists due to the absence of a proper Island Communities Impact Assessment, which is legally required under the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot meet its legal obligations to assess the social, cultural, and economic effects on the island community. This omission alone renders the determination unlawful.

From a policy standpoint, these inadequacies put the proposal at odds with National Planning Framework 4, particularly regarding the protection of historical assets and locations. The neglect of both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, clearly violates policy standards.

In summary, the lack of consideration for living heritage, intangible cultural value, community rights, and legal requirements creates a significant gap in the evidence. The cultural impacts of the development have not been properly evaluated, and the application lacks the necessary foundation for assessing the true cultural costs associated with the proposal.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The proposal under consideration is accompanied by a Social Impact Assessment commissioned by the developer, which included focus groups with local residents. However, the full report has not been published, resulting in a significant evidential gap. This lack of transparency precludes both public understanding and the competent authority's ability to fully assess the social risks highlighted by the developer's own research.

Summaries available indicate that residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement, not speculation. Nevertheless, the failure to disclose the complete assessment hampers the capacity for proper scrutiny and limits the determination of the significance of these findings in the decision-making process.

Evidence suggests that the proposal is perceived as a direct threat to community identity and cohesion, with "cultural loss" noted within the developer's findings. Despite these concerns, such impacts have not been sufficiently integrated into the application or given appropriate consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency further undermines the Environmental Impact Assessment

process. A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, especially when community character and functioning may be compromised. The absence of the complete dataset leads to a failure in presenting a comprehensive evidential basis for weighing the benefits against the potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, existing evidence points to adverse effects that remain undisclosed. Without the full assessment, it cannot be shown that the proposal complies with this policy.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation due to the lack of access to the complete Social Impact Assessment. This omission is material within the application and reflects a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, alongside the evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This undermines the lawful determination of the application and highlights that it lacks sufficient information to proceed.

### **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The application's evaluation of seascape, landscape, and visual impacts is significantly lacking, failing to accurately reflect the sensitivity of the receiving environment and the scale of change. The West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a pronounced sense of remoteness. The introduction of large-scale turbines near the shoreline would create a pervasive industrial presence, fundamentally altering the character of this landscape and leading to a permanent and irreversible transformation.

Moreover, the application does not sufficiently portray the extent of this visual change. The size and proximity of the turbines would overshadow views from residential areas, historic sites, and popular coastal locations. This would directly affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately convey the significance of this impact within the context of such a sensitive landscape.

Concerns also arise regarding the methodology employed in selecting and presenting visual viewpoints. There is evidence to suggest that these viewpoints may not comprehensively represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been understated, which undermines the assessment's reliability.

Additionally, there is a significant shortcoming in evaluating the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape, connected by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated entities, neglecting their interdependence and resulting in an incomplete appraisal of 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 issue represents not merely a visual impact but also a broader cultural and spatial harm, which has not been sufficiently evaluated in the application.

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

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

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

## **CONSTRUCTION AND POLLUTION RISKS**

The West Lewis coastline is known for its clean coastal waters and significant habitats, both of which are susceptible to disturbance and contamination. The proposal for substantial seabed preparation and installation works within this high-energy Atlantic environment raises serious concerns, particularly as the assessment of construction and pollution risks is incomplete. The application lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans, relying instead on undefined mitigation and contingency measures that would be formulated after consent has been granted. This approach hinders any meaningful evaluation of their adequacy or effectiveness.

There is a troubling reliance on future measures that are not yet defined, especially given the sensitivity of the receiving environment. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate details on prevention, control, or monitoring strategies. Additionally, there is uncertainty surrounding the scale and behaviour of sediment plumes that may

result from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts, leaving potential effects on marine species and habitats inadequately addressed.

The absence of detailed emergency response procedures exacerbates these issues. Deferring contingency planning to a post-consent stage obstructs the assessment of whether sufficient safeguards are in place to handle pollution events. This not only introduces procedural risk but also compromises the ability of the competent authority to evaluate environmental protection measures at the point of determination.

From a regulatory standpoint, the lack of critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. The assessment of likely significant effects and necessary mitigation must occur prior to granting consent, and the absence of such information renders a lawful determination unachievable. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the deficiencies in defined mitigation measures, detailed management plans, and clarity regarding potential impacts contribute to a materially deficient assessment. These shortcomings further underscore the conclusion that the application is incomplete and cannot be appropriately evaluated for construction and pollution risks.

## **FISHERIES AND MARINE LIFE**

The waters off the West Lewis coast sustain a diverse marine ecosystem alongside an active fishing industry. However, the assessment of fisheries and marine life associated with the application is inadequate, failing to provide a thorough evaluation of both ecological and socio-economic impacts. A critical concern is the assumption that fishing activity can be relocated without repercussions. The application does not present evidence that alternative fishing grounds are accessible or capable of absorbing additional pressure. This lack of information is crucial, as displacing fishing activities could lead to overfishing in other areas and potentially have broader economic ramifications for the local fleet. Consequently, without a clear, evidence-based assessment, the effects on fisheries and local livelihoods remain poorly understood.

Furthermore, the proposal poses significant risks to marine species, particularly due to the underwater noise resulting from construction activities. Extended high-energy hammer piling is expected to cause disturbances across considerable distances, which could adversely affect species such as dolphins. The anticipated disruption to a substantial segment of the local bottlenose dolphin population raises serious issues, yet the application downplays the importance of these effects without adequate supporting evidence.

There exists a notable inconsistency within the application regarding the need for licenses to authorise harm to European Protected Species, while simultaneously

asserting that such impacts are negligible. This contradiction undermines the assessment's credibility and raises concerns about compliance with the Habitats Regulations, especially when harm is expected to a degree that necessitates legal approval.

Moreover, the evaluation fails to account for cumulative impacts stemming 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 lacks compliance with both the National Planning Framework 4 and the National Marine Plan. It does not demonstrate that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity. This failure hinders the conclusion that the proposal constitutes sustainable development.

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

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The assessment of the onshore infrastructure is lacking, failing to consider the full scope of impacts from what constitutes a single integrated project. The offshore turbines and onshore works are inherently interconnected, yet they have been evaluated separately. This fragmented approach obscures the true extent of environmental and socio-economic consequences.

The onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure that traverses sensitive landscapes. Excavation will occur in areas of deep peat, notably within Barvas Moor, an important carbon store and ecologically delicate habitat. As a result, the application does not provide a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

The failure to assess the onshore impacts, whether by exclusion or deferral, inhibits proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project components must be considered collectively. However, the division of offshore and onshore elements means that the combined repercussions on peatlands, habitats, and communities remain inadequately understood.

Furthermore, there are considerable risks posed to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not demonstrate a thorough evaluation of impacts on these habitats

or the application of appropriate avoidance measures, thus revealing a significant evidential gap concerning biodiversity protection.

Concerns regarding carbon balance are also raised by the proposal. Disturbing peatland leads to the release of stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application fails to adequately address this issue or show that the overall carbon balance is beneficial.

Additionally, the routing of infrastructure through active croft land creates potential conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, raising concerns over both deliverability and lawful execution.

From a policy perspective, the failure to assess the project comprehensively and to demonstrate protection of peatlands, habitats, and land use interests stands in conflict 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.

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

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The proposal introduces permanent red aviation lighting that will be visible over long distances, resulting in a continuous and intrusive “wall of light” effect across the western horizon. This lighting fundamentally alters the night-time environment of the West Lewis coastline, which is characterised by exceptionally dark skies that contribute to environmental quality, cultural identity, and tourism value.

An Environmental Impact Assessment for this application notably lacks an evaluation of the impacts on visual amenity, landscape character, and the experiences of both residents and visitors. This gap is particularly concerning given the significance of dark skies to the area’s identity and the potential for emerging tourism sectors, such as astro-tourism. The absence of such assessments creates a clear deficiency in the overall landscape and environmental evaluation.

Furthermore, there is no examination of the effects of this artificial lighting on nocturnal wildlife. Species that are particularly sensitive to artificial lighting, such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, may experience disorientation and increased collision risks due to phototaxis. The application does not include a lighting impact assessment or a phototaxis study, which means it fails to evaluate how aviation lighting could impact these species or lead to higher mortality rates.

This issue is exacerbated by the reliance on daytime survey data for the ornithological

assessment, which does not account for nocturnal activities and the associated risks. Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk remains unassessed. The lack 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 face adverse effects. The evidential standard necessary 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 the National Planning Framework 4 regarding the protection of natural places and environmental quality. It undermines the broader evaluation of landscape and seascape impacts, as the character of the night-time environment is a vital component of the overall ecosystem.

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

## **TOURISM**

The evaluation of tourism impacts within the application is inadequate, neglecting to address the economic and social ramifications for a critical component of the Isle of Lewis economy. The island's tourism sector relies heavily on its scenic coastline, largely untouched landscapes, dark skies, and a sense of isolation. While the application notes that 86% of visitors are attracted by the scenery, it lacks a detailed quantitative analysis of how extensive offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution.

Tourism has experienced substantial growth, with revenue rising from £65 million in 2017 to over £81.5 million, facilitating more than 1,000 jobs and representing up to 16% of the island's economy. Despite this progress, the application fails to explore how the potential industrialisation of the seascape and deterioration of environmental quality could affect Tourism Gross Value Added and the broader economic resilience. Without such an evaluation, it remains unclear if the development would yield a net economic benefit or jeopardise a vital and expanding sector.

Moreover, the analysis does not consider the significance of environmental quality in bolstering tourism, particularly the value of pristine landscapes and dark skies for visitor experiences. This oversight, compounded by the absence of a Dark Skies Assessment, creates a notable gap in understanding the impact on an increasingly important segment of the local economy, including emerging markets like nature-based tourism and astro-tourism.

For an island community that exhibits limited economic diversification, the neglect of tourism impacts carries broader implications for employment, local enterprises, and the sustainability of the community. The failure to conduct a proper Island Communities Impact Assessment means that these economic vulnerabilities have not been assessed in accordance with the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not substantiate compliance with National Planning Framework 4, especially regarding economic impact and the necessity to illustrate net benefit. Furthermore, it contradicts strategic objectives that designate tourism as a priority growth sector, lacking the necessary evidence for the competent authority to properly evaluate the economic ramifications of the proposal.

In summary, the deficiencies in quantifying tourism impacts, assessing the environmental influences on visitor behaviour, and acknowledging the island's economic dependency create a significant evidential shortfall. This situation hinders a thorough appraisal of economic effects and leads to the conclusion that the application is incomplete.

## SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal exemplifies a significant shortfall in meeting the standards of sustainable development as required by statutory duties, national policy, and evidential criteria. This application revisits the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Now, it is being evaluated under an enhanced policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and the wellbeing of communities.

Critical deficiencies in the evidential basis for this application are apparent. There are significant gaps in baseline data, the use of an undefined design envelope, and a reliance on unspecified mitigation measures. Additionally, it neglects important impact pathways such as nocturnal wildlife, complete onshore infrastructure, and the potential effects on tourism. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of likely significant effects or residual impacts.

Procedural inadequacies are also evident. The lack of a compliant Island Communities Impact Assessment breaches the statutory duty outlined in the Islands (Scotland) Act 2018. Furthermore, the non-disclosure of a complete Social Impact Assessment represents a substantial 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 stands in direct opposition to National Planning Framework 4. It does not demonstrate protection for biodiversity, natural environments, or cultural heritage. Additionally, it fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact

modelling. The cumulative effects of both offshore and onshore elements have not been adequately assessed, obscuring their consequences 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 inconsistent in parts. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, thereby invoking the precautionary principle and barring a lawful conclusion regarding acceptable impacts.

Moreover, the proposal would lead to substantial and irreversible changes to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and the negative consequences for tourism represent enduring effects that cannot be mitigated to a satisfactory level.

In summary, the application is both procedurally and substantively inadequate for determination. The extensive information gaps, policy conflicts, and unresolved environmental risks collectively preclude a lawful and evidence-based decision. The competent authority should either deny consent on these grounds or enforce relevant regulatory provisions to mandate the submission of the missing information.

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

### **Additional Comments**

I strongly oppose the proposed wind farm off the coast of Lewis. It would damage the unspoiled character of our coastline and industrialise a landscape that is central to our identity and way of life.

There are also serious concerns about the impact on marine ecosystems, with potential disruption to seabirds, marine mammals, and sensitive habitats from construction and ongoing activity.

This development would also affect community wellbeing, reducing the sense of peace, remoteness, and natural beauty that people here value deeply.

A key issue often overlooked is our dark skies. Lewis has some of the clearest night skies in the UK, but offshore infrastructure and aviation lighting would add to light pollution, permanently diminishing this rare asset for both people and wildlife.

Community-owned wind farms already show a more appropriate model, delivering renewable energy while keeping benefits within the community and strengthening local resilience rather than exporting value elsewhere.

If this is the price of 'green energy', then the balance has been lost.

**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: C9B8E4E4

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

**Dear Sir/Madam**

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. A detailed review of the Environmental Impact Assessment Report and its supporting documentation reveals significant deficiencies across material planning, environmental, cultural, and procedural aspects. The development site is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns regarding the compatibility of the proposal with statutory requirements, national policy, and sustainable development principles are paramount due to its scale, proximity, and design.

The application lacks an adequate evidential basis necessary for a lawful determination. Essential environmental data is missing, with baseline information being limited and inconsistent, leaving key elements of the proposal undefined. The flexible design framework impedes a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures hampers the assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining the claims of negligible or non-significant effects, which are unsupported by robust evidence.

There are substantial policy conflicts evident within the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests required for consent, hindering the competent authority's ability to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposal, featuring large turbines situated in close proximity to the shoreline, raises significant concerns about landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, the reliance on undefined mitigation, the evidential weaknesses, and the clear policy non-compliance highlight that the application is incomplete and incapable of supporting a lawful determination. Under these conditions, the precautionary principle must apply.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

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

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

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

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

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

## **ASSESSMENT OF ALTERNATIVES**

The proposal in question lacks an adequate assessment of alternatives, failing to satisfy the statutory requirements set forth by the Environmental Impact Assessment

regime. It does not provide a structured or reasoned comparison of viable alternatives based on their environmental effects. Instead, the application offers a narrative that outlines the project's evolution, which does not adequately demonstrate that less harmful options have been appropriately identified, evaluated, and selected over more damaging alternatives.

There is a noticeable absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. The application notably does not show that the developer has adequately considered the possibility of situating turbines further offshore, a measure that could potentially reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline, coupled with the crucial significance of proximity to shore in assessing impact, the lack of such analysis undermines any claim that the proposed siting is the least damaging option available.

These inadequacies extend to the assessment of cable routing and landfall, wherein there is insufficient evidence suggesting that alternative routes have been properly investigated to avoid or lessen impacts on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The failure to present a clear avoidance strategy, along with the lack of comparative analysis, suggests that there has been no application of mitigation by design, relying instead on measures that would occur post-design.

Consequently, the application does not adequately illustrate that environmental harm has been minimised through careful site selection, layout decisions, and routing of infrastructure. This represents a significant failure to adhere to the established mitigation hierarchy, inhibiting the competent authority from determining whether less harmful and more suitable alternatives are available. In the absence of a thorough assessment of alternatives, it cannot be concluded that the proposal is either sustainable or compliant with relevant policy frameworks.

From a policy standpoint, this deficiency calls into question compliance with National Planning Framework 4, particularly with regard to the protection of natural areas, cultural heritage, and the wellbeing of the community. The lack of a structured and comparative assessment constitutes a material omission that contributes to the overall finding that the application has not been thoroughly assessed and thus cannot support a lawful determination.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The assessment of marine ecology and protected species associated with the proposed development is seriously flawed. It does not offer a complete understanding of the ecological receptors in the West Lewis coastal environment. This area is known for its high sensitivity and biological activity, yet the baseline data is lacking. The methods employed do not adequately capture the presence, behaviour, or habitat use of species in the region. Consequently, the assessment fails to provide a sound basis for evaluating the potential impacts of the project.

There is a significant oversight concerning otters, which are classified as a European Protected Species. The application neglects to properly recognise and assess their active use of coastal regions for foraging and movement. The failure to consider their core foraging range and behaviour means that the potential impacts of construction-related disturbances, noise, and increased activity have not been sufficiently evaluated. This gap undermines any conclusions about the absence of significant effects on this species.

The assessment also falls short in evaluating basking sharks. The reliance on aerial surveys introduces a considerable detection bias, especially under Atlantic conditions. This method is likely to underestimate the presence of these sharks, particularly when compared to established land-based observations that show frequent use of these waters. The omission of such data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings imply that any conclusions regarding negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of adequate baseline data obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out by the Environmental Impact Assessment regime and the National Planning Framework 4. Protected species have not been appropriately identified or assessed. The uncertainty introduced by these deficiencies prevents the conclusion of no adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these factors, granting consent would not be lawful.

Overall, the combination of incomplete baseline data, inadequate methodologies, and unsubstantiated conclusions renders the assessment unreliable. These shortcomings hinder a thorough evaluation of impacts on marine ecology and protected species, indicating that the application lacks a sufficient evidential foundation.

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The assessment of the proposed development is fundamentally flawed, with substantial gaps in evidence and inconsistencies that call into question its findings. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application does not meet the necessary evidential standard to demonstrate that these species will remain unharmed. Key foraging areas and migratory pathways are located within the development site, yet the assessment fails to adequately evaluate the risks associated with displacement, collision, or habitat loss.

There is a significant contradiction within the application itself, as the developer

concludes there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the credibility of the assessment, suggesting that its conclusions lack adequate support from the evidence provided. Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will not be affected. The vital importance of these feeding grounds is not comprehensively acknowledged, and the reliance on modelling approaches introduces a degree of uncertainty, especially for species such as Kittiwakes and Fulmars, which are already in severe decline. The methodologies used are likely to underestimate potential mortality, particularly when baseline data is lacking and behavioural responses remain inadequately understood.

The siting of turbines within a designated migratory corridor creates an additional risk, posing a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not properly assess the long-term consequences of ongoing mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential requirements to conclude that there will be no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, along 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, precluding a lawful conclusion in favour of consent.

Moreover, the identified deficiencies represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the conservation of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

In summary, the assessment is unreliable due to its internal contradictions, methodological shortcomings, and lack of sufficient evidence. These issues hinder a thorough evaluation of the impacts and lead to the overall conclusion that the application does not fulfil the statutory requirements necessary for a lawful determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

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

A major shortcoming is the treatment of culturally important sites, such as the

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

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

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

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

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

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

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The proposal raises significant concerns regarding social impacts, health, and wellbeing, as the assessment conducted appears to be materially deficient and lacks the necessary transparency for a lawful evaluation. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the complete report has not been made public. This absence creates a considerable evidential gap, hindering both the public and the competent authority from grasping the full extent of the social risks revealed by the developer's own research.

Evidence suggests that residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts stem from direct engagement with the community and are therefore based on observable realities rather than speculation. Nevertheless, the failure to disclose the full assessment limits the opportunity for proper scrutiny of the findings and restricts the ability to assess their significance in the decision-making process.

Moreover, there is an indication that the proposal poses a perceived threat to community identity and cohesion, with concerns about “cultural loss” documented in the developer’s own findings. Despite this, the full extent of these impacts has not been adequately incorporated into the main application or given the appropriate weight they deserve. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. An in-depth understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially when they may affect community character and functioning. By not providing the complete dataset, the application does not offer a comprehensive evidential basis to evaluate the balance between potential benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. The development should contribute to positive health outcomes and mitigate harm, yet the existing evidence indicates adverse effects that have not been fully disclosed. Without access to the full assessment, it is impossible to verify compliance with this policy.

The procedural implications of this situation are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment. This represents a material omission within the application and a failure to meet the evidential requirements established 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 evaluation incomplete and unreliable. This situation inhibits a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The evaluation of seascape, landscape, and visual impacts is significantly inadequate, failing to accurately portray the degree of change and the sensitivity of the environment. The West Lewis coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a strong sense of remoteness. The addition of large-scale turbines in close proximity to the shore would create a persistent industrial presence, fundamentally changing this character and leading to an irreversible transformation of the landscape.

Moreover, the application does not sufficiently depict the extent of this visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not accurately reflect the significance of this impact within the context of such a sensitive landscape.

Concerns are also present regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not comprehensively represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact is understated, casting doubt on the reliability of the assessment.

Additionally, there is a notable failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape connected by visual and spatial relationships to the Atlantic horizon. The assessment treats these as isolated assets without acknowledging their interdependence, which results in an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, modifying the context in which heritage assets are perceived and severing their connection to the natural horizon. This signifies not just a visual impact, but also a wider cultural and spatial damage that has not been properly evaluated within the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly regarding the protection of natural spaces and historic assets. The scale of change is incompatible with the requirement to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertion of compliance with policy.

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

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

## **CONSTRUCTION AND POLLUTION RISKS**

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

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

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

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

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

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

## **FISHERIES AND MARINE LIFE**

The assessment of fisheries and marine life provided within the application is inadequate and lacks a thorough evaluation of both ecological and socio-economic impacts. The waters adjacent to the West Lewis coast are home to a diverse marine

ecosystem and support an active fishing industry. However, the application does not adequately demonstrate how these habitats and uses can be safeguarded or maintained without significant disruption.

A notable concern is the assertion that fishing activities can be displaced without adverse consequences. The application does not present evidence that alternative fishing grounds are available, accessible, or capable of accommodating any additional pressure that might arise from this displacement. This oversight is critical, as such displacements pose the risk of overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a detailed, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, particularly due to underwater noise generated during construction activities. The use of high-energy hammer piling for extended periods is expected to disturb marine life across wide areas, with notable impacts on species such as dolphins. The anticipated disturbance to a significant proportion of the local bottlenose dolphin population raises serious concerns, yet the application downplays these effects without providing sufficient supporting evidence.

Furthermore, there is a striking inconsistency within the application. While it acknowledges the necessity for licences to permit harm to European Protected Species, it simultaneously characterises these impacts as negligible. This contradiction undermines the credibility of the assessment and raises questions regarding compliance with the Habitats Regulations, especially where harm is expected to require legal authorisation.

The assessment also neglects to address cumulative impacts that result from various pressures such as habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential for understanding the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to illustrate how the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which hampers any conclusions about the proposal's sustainability.

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

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The assessment of the onshore infrastructure is materially incomplete, failing to account for the full extent of impacts stemming from this single integrated project. The intrinsic link between the offshore turbines and the onshore works is overlooked, leading to a fragmented analysis that obscures the true scale of environmental and socio-economic effects.

Onshore elements encompass cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, thus preventing a complete understanding of the project's overall environmental footprint.

The failure to address or defer the assessment of onshore impacts impedes a proper evaluation of cumulative effects. According to the Environmental Impact Assessment process, all components of a project must be considered collectively; however, the separation of offshore and onshore elements results in a lack of clarity regarding their combined impacts on peatlands, habitats, and communities.

Sensitive habitats, including machair systems and peatland environments that are under policy protection, face significant risks. The application does not provide evidence that impacts on these habitats have been fully assessed or that appropriate avoidance measures have been implemented, highlighting a clear evidential gap concerning biodiversity protection.

Concerns regarding carbon balance also arise from the proposal. Disturbance of peatland leads to the release of stored carbon, which may create a carbon debt that contradicts the goals of renewable energy development. The application falls short of adequately addressing this issue or demonstrating that the overall carbon balance remains beneficial.

Furthermore, the routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application does not evidence that the necessary consents or processes have been initiated, raising doubts about deliverability and lawful implementation.

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

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

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in defining the area's environmental quality, cultural identity, and tourism potential. However, the Environmental Impact Assessment fails to address the significant implications of the proposed permanent red aviation lighting, which would create a persistent and intrusive "wall of light" effect across the western horizon, drastically altering the night-time environment.

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

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

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

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

From a policy standpoint, this omission contravenes National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the character of the night-time environment is an essential component of the overall ecosystem.

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

## **TOURISM**

The assessment of tourism impacts is significantly lacking, failing to consider the economic and social consequences for a vital part of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscape, dark skies, and a sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide a detailed evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contributions.

The tourism sector has seen substantial growth, 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. Nevertheless, the application fails to consider how the industrialisation of the seascape and deterioration of environmental quality could affect Tourism Gross Value Added or the resilience of the wider economy. Without this analysis, it is impossible to determine if the proposed development would yield a net economic benefit or detrimentally impact an established and expanding sector.

Moreover, the assessment does not address the critical role of environmental quality in sustaining tourism, overlooking the significance of unspoiled landscapes and dark skies for visitor experiences and emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, creating a substantial gap in understanding the implications for a recognised and burgeoning segment of the local economy.

In a community with limited economic diversity, neglecting the impacts on tourism carries broader implications for employment, local businesses, and community sustainability. The absence of a thorough Island Communities Impact Assessment means these economic vulnerabilities have not been examined as required under the Islands (Scotland) Act 2018.

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

Overall, the failure to quantify tourism impacts, assess environmental influences on visitor behaviour, and consider the island's economic dependencies results in a significant evidential void. This inhibits 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 highlights significant deficiencies that undermine its alignment with sustainable development principles. It echoes the core concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a primary issue. Despite being submitted under an enhanced policy framework that emphasises biodiversity,

peatland protection, landscape integrity, and community wellbeing, the application fails to adequately address these crucial aspects.

A reliable evidential basis for decision-making is lacking, with critical gaps in baseline data. The design envelope remains undefined, and unspecified reliance on mitigation measures raises concerns. Furthermore, key impact pathways—such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—are overlooked. This leads to an incomplete Environmental Impact Assessment, which does not sufficiently inform stakeholders about likely significant effects or residual impacts.

The proposal also reveals procedural shortcomings, including the lack of a compliant Island Communities Impact Assessment, which breaches statutory obligations under the Islands (Scotland) Act 2018. Additionally, the incomplete disclosure of the Social Impact Assessment is a serious omission that hampers the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience. Such inadequacies render the application unfit for determination.

Moreover, the proposal is at odds with National Planning Framework 4, as it does not demonstrate the necessary protections for biodiversity, natural places, and cultural heritage. There is no assurance that health and wellbeing impacts are acceptable, nor is there evidence of a net economic benefit, particularly due to the lack of tourism impact analysis. The cumulative effects of both offshore and onshore elements are inadequately assessed, obscuring their influence on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks persist, particularly in relation to marine ecology, seabirds, protected species, and marine mammals. The assessments are incomplete and, in certain areas, inconsistent. The evidential threshold required to eliminate adverse effects beyond reasonable scientific doubt has not been satisfied, necessitating the application of the precautionary principle. This failure to meet evidential standards prevents the conclusion that impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The multitude of information deficiencies, coupled with conflicts in policy and unresolved environmental risks, impede a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent based on these grounds or invokes the relevant regulatory provisions to require the submission of the missing information.

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

## Additional Comments

I object to the proposed N4 Spiorad na Mara wind farm. In submitting this objection I promote instead a much better future wherein this project is dropped.

My concerns are as follows:

This application represents "Project Splitting" and fails to account for the total environmental and carbon cost to the island:

- The assessment fails to account for the total carbon store degradation caused by digging up the Barvas Moor peatlands. (NPF4 Policy 1; NPF4 Policy 5 (Soils))
- Failure to assess impacts on irreplaceable machair habitats at the landfall point constitutes a direct breach of NPF4 Policy 3.
- Given the significant "Information Deficiencies," the developer has failed to prove, "beyond reasonable scientific doubt," that the environment will not be irreparably harmed (Habitats Regulations)
- The project is notably inconsistent with the 2008 AMEC/Lewis Wind Power Ministerial Precedent, which established that the Lewis Peatlands SPA constitutes a "national interest" carrying a "weight of importance" that outweighed the benefits of energy production; a conservation priority further strengthened by NPF4 Policy 1, which mandates that significant weight be given to the global climate and nature crises in all planning decisions (Ministerial Decision 2008; NPF4 Policy 1).

The Environmental Impact Assessment Report (EIAR) is deficient because it lacks site-specific data and fails to assess a realistic worst-case scenario:

- The application represents a deficient EIAR because it contains significant gaps in baseline data regarding local species. (National Marine Plan; NPF4 Policy 1)
- The developer has made a failure to apply a realistic worst-case scenario, meaning the true impacts remain unknown. (Electricity Works (EIA) (Scotland) Regulations 2017)
- The use of the Rochdale Envelope principle in this sensitive location is inappropriate as it masks the scale of environmental harm. (NPF4 Policy 4; Marine Scotland Guidance).

The project will cause a permanent loss of Astronomical Amenity and make extinct nocturnal species through phototaxis (fatal attraction to light):

- The project will result in a permanent loss of astronomical amenity, destroying the West Side's appeal as a dark sky destination. (NPF4 Policy 30; LDP Policy PD2)
- The developer has failed to establish a proper nocturnal baseline, ignoring the lethal

risk to  
nocturnal species. (NPF4 Policy 3; Marine Policy Statement).

The developer has failed the mandatory Enhancement test required by NPF4:

- The project fails the NPF4 Policy 3 mandate, which requires a measurable net gain for biodiversity, not just mitigation. (NPF4 Policy 3)
- The proposal offers no genuine biodiversity enhancement and fails to contribute to our local Nature Network. (NPF4 Policy 3(a))
- Failure to provide detailed CEMPs or Pollution Prevention Plans prevents a robust assessment.
- "An Appropriate Assessment cannot conclude 'no adverse effect' given that high-energy piling will disturb 28% of the local bottlenose dolphin population." (NPF4 Policy 4; Habitats Regulations).

The developer has already filed a Derogation Case, (a legal loophole used when a project admits it will definitely damage a protected area):

- The developer's own Habitats Appraisal Derogation Case proves that the project cannot be completed without damaging protected nature sites. (Habitats Regulations; NPF4 Policy 3)
- The proposal fails the Precautionary Principle, as there is no evidence beyond reasonable scientific doubt that local bird populations will survive. (National Marine Plan Policy GEN 9)
- I object on the grounds that the project poses an unacceptable risk to SPA-integrity (Special Protection Areas). (NPF4 Policy 4; Birds Directive).

In regard to Fishing, Marine Life, and Protected Species, the proposal fails to provide a robust evidence base:

- "The application contains significant methodological deficiency by using biased aerial surveys that ignore established land-based basking shark data." (National Marine Plan Policy GEN 9)
- "The proposal fails NPF4 Policy 11 and NMP Policy GEN 4 as it provides no evidence that alternative fishing grounds are available to prevent industry cannibalisation." (NPF4 Policy 11; NMP Policy GEN 4)
- "The requirement for European Protected Species (EPS) licenses proves that environmental impacts are not 'negligible' as claimed." (NPF4 Policy 3; EPS Regulations).

What impact will this proposed project have on the mental health and sense of wellbeing of our community? By not disclosing the full Social Impact Assessment (SIA)

data, the developer has prevented the community from seeing the true health risks:

- I object to the non-disclosure of social impact data, which prevents a transparent assessment

of the project's risks. (NPF4 Policy 14; Aarhus Convention)

- The proposal will have a documented adverse impact on mental health and wellbeing, which

is a material violation of NPF4 Policy 14. (NPF4 Policy 14 (Health and Wellbeing)).

Furthermore, the developer has failed to assess intangible heritage and the living landscape,

violating the requirement to protect the unique cultural identity of our island communities:

- The assessment fails NPF4 Policy 7 by ignoring the intangible and living heritage of the West

Side community. (NPF4 Policy 7; Historic Environment Policy for Scotland (HEPS))

- There has been an inadequate Island Communities Impact Assessment (ICIA) regarding the

impact on Gaelic culture and local traditions. (Islands (Scotland) Act 2018)

- The project fails to respect the Cultural Landscape as a whole, treating historic sites as

isolated objects rather than a living environment. (LDP Policy EH1; NPF4 Policy 7.

What of economic damage caused by the proposed project? It appears it violates Community Wealth Building policies and risks cannibalising our local workforce:

- The proposal creates a significant socio-economic imbalance and facilitates the benefit export of wealth away from the island. (NPF4 Policy 25; National Marine Plan Policy GEN 2)

- The EIAR fails to model how the "high magnitude of change" to the seascape will reduce

Tourism Gross Value Added (GVA) (NPF4 Policy 30; LDP Policy ED1)

- The lack of a compliant Island Communities Impact Assessment (ICIA) means the vulnerability of the vital tourism sector hasn't been legally evaluated (Islands (Scotland) Act 2018;

NPF4 Policy 4)

- Lack of assessment of industry cannibalisation, where the project causes labour displacement

from our vital care and tourism sectors. (NPF4 Policy 30)

- The development fails the NPF4 Policy 25 mandate for Community Wealth Building. (NPF4

Policy 25).

Can extensive and varied environmental damage be adequately repaired? It appears the developer has no idea. It is problematic to rely on post-consent mitigation. The authorities cannot judge if the project is safe if the solutions are not provided before the decision is made.

- I object to the reliance on post-consent mitigation, as the effectiveness of these measures

cannot be scrutinized now. (NPF4 Policy 3; Habitats Regulations)

- The proposal suffers from procedural uncertainty, as key protection plans have been deferred until after permission is granted. (Planning and Infrastructure Act 2025)
- The pre-determination of mitigation without evidence-based results fails the test of a robust planning application. (NPF4 Policy 1).

In closing, I note the Environmental Impact Assessment Report (EIAR) is deficient because it lacks site-specific data and fails to assess a realistic worst-case scenario:

- The application represents a deficient EIAR because it contains significant gaps in baseline data regarding local species. (National Marine Plan; NPF4 Policy 1)
- The developer has made a failure to apply a realistic worst-case scenario, meaning the true impacts remain unknown. (Electricity Works (EIA) (Scotland) Regulations 2017)
- The use of the Rochdale Envelope principle in this sensitive location is inappropriate as it masks the scale of environmental harm. (NPF4 Policy 4; Marine Scotland Guidance).

**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: F75B48DF

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

**Dear Sir/Madam**

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its supporting documents reveals significant planning, environmental, cultural, and procedural shortcomings. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The considerable scale, proximity, and design of the proposal lead to serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a robust evidential basis required for a lawful decision. 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, complicating the assessment of likely significant effects. The flexible design framework further obscures understanding, and the reliance on unspecified mitigation measures prevents any evaluation of their effectiveness. Consequently, the documentation falls short of facilitating a comprehensive understanding of the environmental, cultural, or community impacts, leaving claims of negligible or non-significant effects unsupported by solid evidence.

Moreover, the proposal presents clear and substantive conflicts with existing policy. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. There is no demonstration that the national requirements to protect biodiversity, climate interests, and environmental integrity can be satisfied. Such conflicts challenge the statutory tests for consent and jeopardise the ability of the competent authority to determine the development's acceptability from a policy standpoint.

The unprecedented scale of the proposal raises further alarm, as large turbines are planned to be situated close to the shoreline, raising significant issues relating to landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance indicate that the application is incomplete and cannot sustain a lawful determination. In light of these circumstances, it is essential that the precautionary principle is applied.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report is fundamentally inadequate, failing to deliver a comprehensive, transparent, or dependable evaluation of the potential environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, lacking a commitment to specific dimensions, layouts, or configurations of turbines, generates substantial uncertainty. This ambiguity undermines the assessment's integrity and inhibits a consistent application of a worst-case scenario, ultimately preventing both the public and the competent authority from grasping the full extent of environmental effects that may arise from the development.

Moreover, the application is overly reliant on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be mitigated at a later stage obstructs any meaningful evaluation of the effectiveness of those measures or the assessment of residual impacts. Such deferral of critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which stipulates that likely significant effects and mitigation strategies must be clearly established prior to determination.

Additionally, significant evidential gaps exist, including deficiencies in baseline data and methodological limitations, as well as reliance on assumptions rather than site-specific evidence. This situation results in uncertainty regarding the magnitude and significance of impacts, especially where conclusions of negligible or non-significant effects are reached without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot be reconciled with statutory obligations.

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

In conclusion, the combination of reliance on an undefined design envelope, absence of clearly articulated mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings inhibit a lawful and rigorous evaluation of environmental effects and leave the competent authority unable to make an informed decision based on the information provided.

## **ASSESSMENT OF ALTERNATIVES**

The proposed application fails to meet the statutory requirements of the Environmental Impact Assessment regime, particularly in its assessment of alternatives. Instead of offering a structured and reasoned comparison of feasible alternatives based on their environmental effects, the application presents a narrative of the project's evolution.

This method does not adequately demonstrate that less harmful options have been identified, evaluated, and chosen over more damaging solutions.

Moreover, there is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the developer has not shown that placing turbines further offshore has been seriously considered, despite the likelihood that such a move would reduce visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the critical significance of proximity to shore in assessing impact make this omission particularly concerning. Without such analysis, it is impossible to assert that the proposed siting is the least damaging option.

The deficiencies also extend to the assessment of cable routing and landfall. There is insufficient evidence indicating that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The lack of a clear avoidance strategy, coupled with the absence of comparative analysis, suggests that the principles of mitigation by design have not been employed, with an overreliance on post-design mitigation measures instead.

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

From a policy standpoint, these deficiencies undermine adherence to National Planning Framework 4, especially concerning the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that leads to the conclusion that the application has not been properly evaluated and cannot be lawfully determined.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The assessment regarding marine ecology and protected species is significantly inadequate, failing to provide a thorough and trustworthy understanding of ecological receptors in the West Lewis coastal environment. This region is characterised by its sensitivity and biological activity, yet the methodologies used lack the ability to fully capture species presence, behaviours, and habitat usage, leading to an incomplete baseline data set. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

Notably, the assessment neglects to adequately identify and evaluate otters, which are classified as a European Protected Species. The application does not recognise their active utilisation of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to a significant oversight in

assessing the potential effects of construction-related disturbances, noise, and increased activity. This omission undermines the conclusions drawn regarding the absence of significant effects on otters.

Additionally, the evaluation of basking sharks is problematic, as it relies heavily on aerial surveys that introduce notable detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially in comparison to established land-based observations that indicate their frequent use of these waters. The failure to integrate or adequately consider such data results in a deficient baseline and diminishes the reliability of the conclusions reached.

Due to these methodological shortcomings, the conclusions asserting negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual scale of risks to marine species and habitats.

From a regulatory standpoint, the application does not adhere to the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, granting consent cannot be justified under the law.

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

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The proposed development is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which is home to internationally significant seabird populations that are already in decline. However, the ornithological assessment accompanying the application is fundamentally flawed. It contains significant gaps in evidence and internal inconsistencies that seriously undermine its conclusions. The assessment fails to sufficiently demonstrate that these vulnerable species will not be adversely affected, particularly in light of the potential for displacement, collision risk, and habitat loss.

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

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

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

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

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

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

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The proposed development presents significant shortcomings in its assessment of cultural heritage and community identity, particularly regarding the West Lewis coastline, which should be viewed as a living cultural landscape intertwined with environment, language, tradition, and community. The application adopts a narrow perspective, treating heritage as disconnected, static elements rather than recognising their dynamic social, cultural, and spiritual roles in the community.

A notable oversight is the categorisation of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active burial and spiritual spaces, yet they are considered static features in the assessment. This approach neglects their ongoing use, significance, and the implications of development

on their surroundings. Consequently, this mischaracterisation leads to an inadequate evaluation of cultural impacts and dismisses their importance in community life.

Furthermore, the assessment lacks attention to intangible cultural heritage, including the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These aspects are vital to the area's identity, yet they are wholly absent from the evaluation, resulting in a substantial omission. The absence of these considerations hinders a comprehensive understanding of the cultural impact associated with the development.

Concerns also arise regarding community rights and participation. The Gaelic-speaking community, which embodies characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and fails to adhere to established principles of community participation in matters that affect cultural and environmental interests.

Moreover, there is a critical procedural failure due to the omission of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering the determination unlawful.

These deficiencies also conflict with policy frameworks, particularly National Planning Framework 4, which emphasises the protection of historic assets and places. The failure to consider both tangible and intangible heritage and to acknowledge ongoing cultural practices signifies a clear deviation from policy requirements.

Collectively, the neglect to assess living heritage, intangible cultural values, community rights, and compliance with statutory obligations results in a substantial evidential gap. The cultural impacts of the proposed development have not been adequately addressed, and the application does not furnish a sufficient foundation for understanding the true cultural cost of the proposal.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

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

Furthermore, existing evidence reveals that residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are directly linked to community engagement and are therefore substantiated, not speculative. The failure to disclose the complete

assessment hampers proper scrutiny of these findings, thus limiting the ability to understand their significance in the decision-making process.

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

This deficiency also undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly where community character and functioning could be compromised. The failure to provide the complete dataset means the application lacks a thorough evidential basis for weighing benefits against potential harm.

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

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

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

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The assessment of seascape, landscape, and visual impacts is fundamentally insufficient and does not reflect the extent of change or the sensitivity of the environment involved. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and significant sense of remoteness. The proposed large-scale turbines near the shoreline would introduce a persistent and prominent industrial presence, dramatically altering this character and leading to a permanent and irreversible transformation of the landscape.

Moreover, the application fails to convey the extent of this visual change adequately. The size and proximity of the turbines would overshadow views from residential areas, historical sites, and popular coastal locations. This would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The

assessment does not effectively communicate this impact or its importance in the context of such a delicate landscape.

Concerns also arise regarding the methods used to select and present visual viewpoints. Evidence indicates that these viewpoints might not fully capture the most sensitive receptors or worst-case scenarios, especially regarding significant cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been downplayed, compromising the assessment's reliability.

Another critical shortcoming is the lack of consideration of the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integrated into a broader landscape setting linked by visual and spatial relationships to the Atlantic horizon. The assessment approaches these as isolated entities without recognising their interdependence, leading to an incomplete understanding of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these connections, changing the context in which heritage assets are perceived and altering their relationship to the natural horizon. This represents not only a visual impact but also a more extensive cultural and spatial detriment that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal is in direct conflict with the National Planning Framework 4 regarding the safeguarding of natural areas and historical assets. The magnitude of change is not compatible with the necessity to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertions of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and closeness of the turbines, their presence would be predominant and unavoidable. Thus, the resulting change is fundamental and permanent, rather than something that could be mitigated to an acceptable degree.

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 dependable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

## **CONSTRUCTION AND POLLUTION RISKS**

The proposal does not adequately assess construction and pollution risks, lacking the detail needed to evaluate potential environmental effects. It involves significant seabed preparation and installation work in a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application relies on mitigation and contingency measures that will be developed after consent, making it impossible to assess their effectiveness

or adequacy meaningfully.

This approach is particularly alarming given the sensitivity of the receiving environment. The West Lewis coastline features clean coastal waters and crucial habitats that are at risk from sediment disturbance and contamination. While the application notes risks like sediment mobilisation and accidental chemical or oil spills, it fails to offer sufficient detail on prevention, control, or monitoring measures.

Furthermore, there is uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without solid modelling and clearly defined management strategies, it is not feasible to ascertain the extent, duration, or ecological impacts of these issues. This uncertainty also pertains to potential effects on marine species and habitats identified as sensitive in the broader assessment.

Additionally, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application hinders the evaluation of whether adequate safeguards exist to address pollution events. This creates procedural risks and undermines the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated before consent, and a lawful determination cannot occur if such information is absent. The application also does not demonstrate compliance with policy requirements related to environmental protection and water quality.

Overall, the failure to present defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts render the assessment materially deficient. These issues prevent a thorough evaluation of construction and pollution risks and further indicate that the application is incomplete.

## **FISHERIES AND MARINE LIFE**

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

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

of a clear and evidence-based assessment renders the impacts on fisheries and local livelihoods difficult to understand.

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

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

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

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

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

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The assessment of the onshore infrastructure associated with this project is incomplete, failing to take into account the extensive impacts of what is fundamentally a single integrated development. The offshore turbines and the onshore works are interconnected yet are evaluated separately, leading to a disjointed analysis that obscures the true environmental and socio-economic consequences.

Central to the onshore works are the plans for cabling across protected moorland, the construction of a substation near Stornoway, and the creation of access routes through sensitive landscapes. These activities involve the excavation of deep peat areas, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The application does not provide a thorough examination

of these impacts, hindering an accurate understanding of the project's overall environmental footprint.

By neglecting to assess the impacts of onshore works, the application restricts a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project components must be assessed collectively; however, the distinct treatment of offshore and onshore elements results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

Moreover, there are serious risks to sensitive habitats, including machair systems and peatland environments, which hold policy protection. The application fails to demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures are in place, creating a significant evidential gap regarding biodiversity protection.

Concerns also arise regarding carbon balance, as the disturbance of peatland can release stored carbon, potentially resulting in a carbon debt that undermines the objectives of renewable energy initiatives. The application does not sufficiently address this issue or provide evidence that the overall carbon balance remains positive.

Furthermore, the routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application lacks evidence that the required consents or processes have been initiated, leading to doubts about deliverability and legal compliance.

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

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

## **DARK SKIES AND NOCTURNAL WILDLIFE**

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

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

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

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

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

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

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

## **SUMMARY**

The proposal for the Spiorad na Mara Offshore Wind Farm starkly illustrates a significant failure to meet the principles of sustainable development, particularly when measured against statutory obligations, national policy, and evidential standards. Similar to the 2008 refusal of the Lewis Wind Power proposal, this application again highlights an unacceptable scale of industrialisation, yet it is now being put forward under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and the wellbeing of the community.

The evidential basis for the proposal is incomplete and unreliable, with critical gaps evident in baseline data. The ongoing use of an unspecified design envelope, alongside

unverified mitigation measures, further complicates matters. Notably absent are assessments of key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects. As a result, the Environmental Impact Assessment lacks the thoroughness needed to fully understand potential significant effects or any residual impacts.

Moreover, there are notable procedural shortcomings within the application. The lack of a compliant Island Communities Impact Assessment constitutes a violation of the statutory duty under the Islands (Scotland) Act 2018. Additionally, the incomplete disclosure of the Social Impact Assessment represents a material omission that hinders a proper evaluation of the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inadequate for determination.

This proposal is also fundamentally at odds with National Planning Framework 4. It fails to provide adequate protections for biodiversity, natural landscapes, and cultural heritage, and does not demonstrate that health and wellbeing impacts are acceptable. Furthermore, it cannot substantiate a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been assessed appropriately, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain unclear and potentially significant, as assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in parts. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and barring a lawful conclusion regarding acceptable impacts.

Finally, the proposal would lead to significant and irreversible changes to an already sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and detrimental effects on tourism represent permanent changes that cannot be adequately mitigated.

In conclusion, the application as it stands is both procedurally and substantively unfit for determination. The scale of the deficiencies in information, coupled with policy conflicts and unresolved environmental risks, precludes a lawful and evidence-based decision. Therefore, it is imperative that the competent authority refuses consent on these grounds or invokes the appropriate regulatory provisions to compel the submission of the necessary information. A formal request is made for the complete refusal of the Spiorad na Mara Offshore Wind Farm application.

### **Additional Comments**

I have lived on the Western Isles my whole life. This is a horrendous decision for the islands. Pollution caused by the movement of people and materials. The roads on the island have not been upgraded and cannot handle the transport on it already. The island is being industrialised and not benefitting from it at all.

**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: E622E3D6

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

**Dear Sir/Madam**

This objection is formally submitted against the proposed Spiorad na Mara Offshore Wind Farm application, which has been put forward under the relevant marine licensing and Environmental Impact Assessment regimes. The proposal is situated off the west side of the Isle of Lewis, an area celebrated for its Atlantic-facing coastline, nearly untouched environment, and rich cultural identity. This development raises profound concerns regarding its compatibility with statutory requirements, national policy, and the principles underpinning sustainable development, given the unprecedented scale and proximity of the large turbines to the shoreline.

The Environmental Impact Assessment Report and its supporting documentation exhibit material deficiencies, lacking critical environmental data while presenting limited and inconsistent baseline information. Key components of the proposal remain undefined, leading to an unclear understanding of the likely significant effects. Furthermore, the use of a flexible design framework impedes the ability to assess the effectiveness of mitigation measures that have not yet been specified. Consequently, the documentation fails to provide a thorough or informed understanding of the potential environmental, cultural, or community impacts, with claims of negligible or non-significant effects unsupported by robust evidence.

Clear conflicts with existing policies are evident. The application does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national mandates to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly relate to the statutory tests required for consent and impede the competent authority's ability to determine the proposal's acceptability in policy terms.

The cumulative effect of insufficient information, reliance on undefined mitigation, evidential shortcomings, and blatant policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. Under these circumstances, it is imperative that the precautionary principle is invoked.

**MARINE ECOLOGY AND PROTECTED SPECIES**

The West Lewis coastal environment is characterised as a highly sensitive and biologically active marine system. However, the assessment of marine ecology and protected species is significantly lacking, providing neither a complete nor a reliable understanding of the ecological receptors present. The methodologies employed do not adequately capture species presence, behaviour, or habitat use, leading to an

incomplete baseline data set that undermines the evidential basis for evaluating impacts.

One notable shortcoming is the failure to properly assess otters, a European Protected Species. The application neglects to recognise their active use of coastal areas for foraging and movement. Consequently, the assessment does not address their core foraging range or behavioural patterns, resulting in an insufficient evaluation of potential effects from construction disturbance, noise, and increased activity. This lack of consideration undermines any claims regarding the absence of significant effects on this species.

Additionally, there are critical deficiencies in the assessment of basking sharks. The reliance on aerial surveys introduces substantial detection bias, particularly in Atlantic conditions, likely leading to an underestimation of their presence. Established land-based observations indicate frequent usage of these waters, yet such data has not been adequately incorporated or considered. The methodological limitations inherent in the assessment mean that conclusions of negligible or non-significant effects are based on assumptions rather than robust evidence. Furthermore, the absence of sufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, creating uncertainty around the actual risks to marine species and habitats.

From a regulatory standpoint, the application fails to comply with 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 means that adverse effects cannot be excluded beyond reasonable scientific doubt, necessitating the application of the precautionary principle. In light of these circumstances, granting consent would not be lawful.

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

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

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

Moreover, the application inadequately conveys the scale of this visual transformation.

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

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

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

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

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

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

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

## **TOURISM**

The proposal lacks a thorough assessment of tourism impacts, resulting in a significant oversight regarding the economic and social implications for a vital sector of the Isle of Lewis economy. This area's tourism is heavily reliant on its wild coastline, nearly

untouched landscapes, dark skies, and a sense of isolation. While it is noted that 86% of visitors are attracted by the scenery, the application does not provide a quantified analysis of how large-scale offshore developments may influence visitor numbers, behaviour, or overall economic contributions.

Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the application fails to model how the industrialisation of the seascape and a decline in environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the area. Without such critical analysis, it is impossible to ascertain whether the proposed development would offer a net economic advantage or potentially harm an already flourishing sector.

Moreover, the evaluation neglects to address the significance of environmental quality in attracting tourists, particularly the value of unspoiled scenery and dark skies to visitor experiences, as well as burgeoning markets such as nature-based and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a substantial gap in understanding the potential impacts on this acknowledged and expanding aspect of the local economy.

In an island community with limited economic diversification, the failure to evaluate the consequences on tourism carries broader implications for employment, local enterprises, and community sustainability. The omission of a proper Island Communities Impact Assessment means these economic vulnerabilities have not been assessed as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not illustrate adherence to the National Planning Framework 4, especially concerning economic impact and the necessity to demonstrate net benefit. It also contradicts strategic objectives that highlight tourism as a priority growth sector, and fails to provide enough evidence for the competent authority to evaluate the economic repercussions of the proposal.

In summary, the inadequacy in quantifying tourism impacts, assessing the environmental factors that influence visitor behaviour, and acknowledging the island's economic dependencies culminates in a significant evidential shortfall. This hampers a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

## **SUMMARY**

The Spiorad na Mara Offshore Wind Farm proposal embodies significant shortcomings in relation to sustainable development, as assessed against statutory requirements, national policy, and evidential standards. This application raises similar concerns to those that led to the rejection of the Lewis Wind Power proposal in 2008, particularly regarding the unacceptable scale of industrialisation. The current proposal is presented under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it falls short of these expectations.

There are notable deficiencies in the evidential basis provided for the application. It lacks complete baseline data and continues to use an undefined design envelope, while also relying on unspecified mitigation measures. Furthermore, critical 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 thorough understanding of likely significant effects or residual impacts.

Procedural shortcomings are evident in the absence of a compliant Island Communities Impact Assessment, which violates the statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the full Social Impact Assessment constitutes a significant omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

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

Uncertainty looms over environmental risks, with incomplete assessments of marine ecology, seabirds, protected species, and marine mammals. These assessments display internal inconsistencies and do not meet the evidential threshold required to exclude adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is fundamentally flawed both procedurally and substantively. The combination of information deficiencies, policy conflicts, and unresolved environmental risks obstructs a lawful, evidence-based decision. Therefore, the competent authority is urged to refuse consent for the Spiorad na Mara Offshore Wind Farm application in its entirety.

**Yours faithfully,**

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: B029F0B6

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

**Dear Sir/Madam**

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A review of the Environmental Impact Assessment Report and associated documents has revealed serious deficiencies in planning, environmental, cultural, and procedural aspects of the proposal. The development is planned off the west side of the Isle of Lewis, an area cherished for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The scale and design of this proposal raise urgent concerns about its alignment with statutory requirements, national policy, and the tenets of sustainable development.

The application lacks a solid evidential basis necessary for a lawful determination. There is a troubling absence of critical environmental data, with baseline information being limited and inconsistent. Moreover, several key components of the proposal remain undefined. The reliance on a flexible design framework obscures a clear understanding of the potential significant effects, and the unspecified nature of mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust supporting evidence.

Substantial policy conflicts are evident in this proposal, which appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency particularly pertains to issues of biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not satisfactorily demonstrate its ability to meet national requirements for protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests needed for consent and undermine the capacity of the competent authority to determine the proposal's acceptability within policy frameworks.

The unprecedented scale of the proposal, with large turbines positioned alarmingly close to the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. Collectively, the insufficient information, dependence on undefined mitigation strategies, evidential gaps, and evident policy non-compliance highlight that this application is incomplete and unfit to support a lawful determination. Under these circumstances, it is imperative that the precautionary principle is applied.

**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.

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The assessment presented is critically flawed, failing to accurately capture the significant impacts on seascape, landscape, and visual integrity. The West Lewis coastline, characterised by its open Atlantic horizon and untouched nature, possesses a strong sense of remoteness. The proposed large-scale turbines positioned near the shoreline would impose a continuous industrial presence, drastically transforming this unique character and causing an irreversible change to the landscape.

Significantly, the application does not sufficiently illustrate the extent of this visual change. The sheer scale and proximity of the turbines would overpower views from

residential areas, historic landmarks, and popular coastal spots, directly diminishing visual amenity and compromising the area's intrinsic qualities of naturalness and remoteness. The assessment inadequately conveys the magnitude of this impact, which is especially concerning given the delicate nature of the landscape involved.

Methodological issues further complicate the evaluation, particularly regarding the choice and portrayal of visual viewpoints. Existing evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or the worst-case scenarios, especially in relation to important cultural heritage sites and landscapes of high value. This shortcoming raises doubts about the accuracy of the reported visual impacts, leading to an underestimation that undermines the credibility of the assessment.

Moreover, there is a notable failure to consider the interconnectedness of the landscape, seascape, and cultural heritage. Iconic sites like the Calanais Standing Stones and other Scheduled Monuments are situated within a broader landscape framework that connects them visually and spatially to the Atlantic horizon. Treating these heritage assets in isolation neglects their interdependence, resulting in a superficial understanding of the implications for their setting and cultural significance.

The proposed industrialisation of the seascape would sever these vital relationships, fundamentally altering how these heritage sites are perceived and disrupting their ties to the natural horizon. This concern extends beyond mere visual impact; it also encompasses a significant cultural and spatial harm that has not been thoroughly examined in the application.

From a policy standpoint, this proposal is at odds with the National Planning Framework 4, which aims to protect natural spaces and historic sites. The extent of the proposed changes is inconsistent with the need to maintain landscape character, visual amenity, and the settings of culturally significant areas. Additionally, the lack of a comprehensive worst-case impact assessment further discredits any assertions of policy compliance.

Ultimately, the identified impacts are such that they cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be unavoidable and dominate the landscape. This leads to a fundamental and permanent alteration that cannot be diminished to an acceptable level through any mitigation efforts.

In summary, the assessment fails to accurately depict the extent of the impact, the sensitivity of the environment, and the intertwined nature of landscape and heritage. These substantial deficiencies preclude a reliable evaluation and reinforce the conclusion that the proposal is fundamentally incompatible with the preservation of this significant landscape.

## **CONSTRUCTION AND POLLUTION RISKS**

The proposal is fundamentally flawed due to an incomplete assessment of construction and pollution risks, which lacks the necessary detail to evaluate the likely environmental effects. The West Lewis coastline, characterised by clean coastal waters and significant habitats, is particularly sensitive to disturbances, yet the application does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be devised after consent, obstructing a meaningful assessment of their adequacy and effectiveness.

Concerns are amplified by the application's acknowledgment of risks such as sediment mobilisation and accidental spills of chemicals or oil, yet it fails to detail how these will be prevented, controlled, or monitored. This reliance on undefined future measures is particularly troubling given the environmental sensitivities involved. Furthermore, there remains considerable uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without rigorous modelling and well-defined management strategies, the potential extent, duration, or ecological effects of these impacts cannot be established, leaving the effects on sensitive marine species and habitats inadequately addressed.

Additionally, the absence of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent is granted, the application effectively undermines the assessment of whether adequate safeguards are in place to address potential pollution events. This introduces significant procedural risks, hindering the competent authority's ability to evaluate the proposed environmental protection measures at the point of determination.

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

In summary, the lack of defined mitigation measures, detailed management plans, and clarity regarding potential impacts culminate 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 proposes a development that inadequately assesses the impacts on fisheries and marine life, failing to provide a thorough evaluation of both ecological and socio-economic consequences. 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 will be safeguarded against significant disruption.

A critical concern is the assumption made by the application that fishing activities can be shifted without adverse effects. There is no evidence presented to suggest that alternative fishing grounds exist, are accessible, or can accommodate additional fishing pressures. This lack of information is crucial, as the displacement of fishing efforts could lead to overfishing in other areas, posing broader economic risks to the local fishing fleet. The absence of a clear, evidence-based evaluation means that the repercussions for fisheries and livelihoods remain unclear.

Furthermore, the proposal carries considerable risks for marine species, particularly due to the underwater noise generated during construction activities. The use of high-energy hammer piling over an extended duration is expected to create disturbances across substantial distances, affecting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises important concerns. However, the application appears to downplay the seriousness of these impacts, lacking adequate supporting evidence.

Additionally, there is a notable inconsistency within the application itself, where the necessity for licences to permit harm to European Protected Species is acknowledged, while simultaneously claiming that the impacts are negligible. This contradiction undermines the assessment's credibility and raises questions about adherence to the Habitats Regulations, especially where anticipated harm warrants legal authorisation.

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

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

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

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The assessment of onshore infrastructure is incomplete and does not account for the full range of impacts associated with what constitutes a single integrated project. The offshore turbines and the onshore works are linked yet evaluated separately, leading to a fragmented perspective that obscures the actual scale of both environmental and socio-economic consequences.

Onshore components encompass cabling across protected moorland, the

construction of a substation near Stornoway, and related access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, recognised as a significant carbon store and ecologically sensitive habitat. The application fails to provide a thorough assessment of these impacts, which hampers a complete understanding of the project's overall environmental footprint.

By deferring or excluding the assessment of onshore impacts, the application undermines the ability to evaluate cumulative effects properly. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the disjointed evaluation of offshore and onshore elements means that the combined effects on peatlands, habitats, and local communities remain insufficiently understood.

There are notable risks posed to sensitive habitats, including machair systems and peatland environments that are under policy protection. The application does not adequately demonstrate that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been put in place, leading to a significant evidential gap concerning biodiversity protection.

Additionally, the routing of 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 pursued, leading to concerns about the project's deliverability and lawful implementation.

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

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

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The Environmental Impact Assessment is markedly deficient in its evaluation of nocturnal wildlife and dark skies, which constitutes a significant omission. The coastline of West Lewis is noted for its exceptionally dark skies, integral to both environmental quality and cultural identity, as well as being a draw for tourism. The proposal intends to install permanent red aviation lighting that would be observable over considerable distances, thereby creating a persistent and intrusive "wall of light" across the western horizon, fundamentally altering the nocturnal environment.

There is no assessment of how this lighting would impact visual amenity, landscape

character, or the experiences of local residents and visitors. Such an oversight is particularly significant in light of the role that dark skies play in the area's identity and the burgeoning sector of astro-tourism. This lack of consideration introduces a clear deficiency in the comprehensive landscape and environmental evaluation.

More importantly, the proposal fails to include an evaluation of the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially susceptible to artificial lighting due to their phototactic responses, which can cause disorientation and raise the risk of collisions. There is no lighting impact assessment or phototaxis study included in the application, resulting in an inadequate evaluation of how aviation lighting may affect these species or contribute to increased mortality.

This oversight is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not adequately address nocturnal activity or related risks. Species such as Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation due to artificial lighting, yet this potential hazard has not been examined. The absence of data specific to night-time conditions creates a crucial gap in the understanding of ecological impacts.

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

From a policy standpoint, these omissions contradict the guidelines set forth in the National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. Moreover, they undermine the overall evaluation of landscape and seascape impacts, as the character of night-time environments is an essential aspect of the overall ecological framework.

In summary, the lack of assessment concerning dark skies and nocturnal wildlife represents a substantial evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analyses render the application incomplete and inadequate for a lawful decision-making process.

## **TOURISM**

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

behaviour, or the overall economic contribution to the area.

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

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

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

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

## SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm raises serious concerns about its alignment with sustainable development principles as outlined in statutory duties, national policy, and evidential standards. It mirrors the issues that led to the 2008 rejection of the Lewis Wind Power proposal, where the extent of industrialisation was deemed unacceptable. Despite being presented within a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the proposal falls short.

Critical gaps in baseline data undermine the evidential basis for decision-making. The reliance on an undefined design envelope, unspecified mitigation measures, and the failure to consider significant impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects leave the Environmental Impact Assessment incomplete. This lack of thoroughness prevents an understanding of likely significant effects or residual impacts.

Moreover, there are evident procedural shortcomings. The failure to conduct a compliant Island Communities Impact Assessment contravenes statutory duties under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment is a material omission. These deficiencies hinder the competent

authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

The proposal directly contradicts 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, primarily due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been thoroughly evaluated, masking impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Incomplete assessments concerning marine ecology, seabirds, protected species, and marine mammals, along with internal inconsistencies, indicate that the evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle, thereby preventing a lawful conclusion regarding the acceptability of impacts.

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

In conclusion, the application is fundamentally unfit for determination, both procedurally and substantively. The significant information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision-making process. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm application is refused in its entirety.

### **Additional Comments**

I feel the visual impact of these turbines will be terrible on the landscape. I am not against windfarms just the size of these turbines.

**Yours faithfully,**

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 89AD08F8

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

**Dear Sir/Madam**

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is based on a comprehensive review of the Environmental Impact Assessment Report and associated documentation, revealing significant planning, environmental, cultural, and procedural deficiencies. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns arise regarding the proposal's scale, proximity, and design, as these factors fundamentally challenge its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential foundation for a lawful determination. There is a notable absence of critical environmental data, while baseline information is found to be limited and inconsistent. Key components of the proposal remain undefined, and the use of a flexible design framework complicates the assessment of likely significant effects. Furthermore, the reliance on unspecified mitigation measures hinders the evaluation of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidential support.

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

The unprecedented scale of the proposal, featuring large turbines positioned near the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, dependence on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance underscores the application's incompleteness and its incapacity to support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

**MARINE ECOLOGY AND PROTECTED SPECIES**

The assessment concerning marine ecology and protected species presents significant deficiencies that compromise the understanding of ecological receptors within the West Lewis coastal environment. This area is notably sensitive and biologically active; however, the baseline data provided is incomplete, and the methodologies utilised fail to capture the presence, behaviour, and habitat use of various species. Consequently, the evidential basis for evaluating potential impacts is inadequate.

Specifically, there is a critical oversight regarding otters, a species protected under European law, as the application does not adequately recognise or assess their active foraging and movement in coastal areas. The assessment neglects to consider their core foraging range and behavioural patterns, thereby failing to properly evaluate the potential effects of disturbances caused by construction, noise, and increased activity. This oversight undermines any conclusions drawn about the absence of significant effects on otters.

Further shortcomings exist in the assessment of basking sharks, where the reliance on aerial surveys introduces significant detection bias, particularly under Atlantic conditions. This method is likely to lead to an underestimation of the species' presence, especially when contrasted with established land-based observations indicating their frequent use of these waters. The failure to incorporate or adequately consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings mean that assertions of negligible or non-significant effects are based more on assumptions than on sound evidence. The lack of sufficient baseline data obstructs a meaningful assessment of cumulative and indirect impacts, including those arising from seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not conform to the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to properly identify and assess protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, it is not lawful to grant consent.

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

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The assessment of the proposed development presents numerous deficiencies that fundamentally undermine its reliability. There are significant gaps in evidence and

inconsistencies within the findings that call into question the conclusions drawn. The location of the development within crucial foraging areas and migratory pathways for seabirds, particularly on the west coast of the Isle of Lewis, raises concerns, especially given that these populations are already experiencing decline. The application fails to adequately demonstrate that these internationally important species will not face adverse effects, particularly in light of potential habitat loss, displacement, and collision risks.

A critical contradiction arises from the developer's assertion of no significant adverse effects, while simultaneously submitting a Habitats Regulations derogation case, which is only applicable when significant harm is anticipated. This inconsistency casts doubt on the validity of the assessment, indicating that the conclusions are not underpinned by sufficient evidence. Furthermore, there is a lack of robust evidence to confirm that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The essential feeding grounds for these birds have not been fully acknowledged, and the reliance on modelling methods introduces considerable uncertainty, especially for species experiencing severe decline, like Kittiwakes and Fulmars. The methodologies employed may underestimate mortality rates, particularly when baseline data is incomplete and the behavioural responses of species are not comprehensively understood.

Moreover, the placement of turbines within a known migratory corridor adds an additional layer of risk. This development effectively creates a barrier within a primary flight path that is critical for species migrating between the United Kingdom and Iceland. The assessment does not sufficiently explore the long-term consequences of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

Regulatory standards are also not met, as the application fails to provide the necessary evidential threshold to conclude that there would be no adverse effect on the integrity of protected sites. The presence of contradictory findings, data gaps, and modelling shortcomings indicates that the standard of beyond reasonable scientific doubt has not been satisfied, necessitating the application of the precautionary principle and thereby hindering a lawful conclusion in favour of consent.

Overall, these identified shortcomings reflect a failure to comply with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected positions the proposal at odds with national policy. Collectively, these factors render the assessment unreliable, as the internal inconsistencies, methodological flaws, and insufficient evidence hinder a thorough evaluation of potential impacts and contribute to the conclusion that the application does not fulfil the statutory requirements for determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The assessment surrounding community identity and cultural heritage is fundamentally flawed, neglecting to acknowledge the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. This application adopts an overly simplistic viewpoint, treating heritage merely as a collection of isolated, static elements rather than recognising their dynamic social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial and spiritual sites, yet the assessment portrays them as fixed features, overlooking their ongoing significance, usage, and the potential impact of development on their surroundings. This oversight leads to an incomplete understanding of cultural implications and dismisses their importance in community life.

Moreover, the application neglects to consider intangible cultural heritage, which encompasses the Gaelic language, traditions, and the long-standing bond between the community and the coastal environment. These elements are vital to the identity of the area, yet they are entirely omitted from the assessment, which represents a considerable gap. Without examining these factors, one cannot fully comprehend the cultural impact of the proposed development.

Concerns also arise regarding community rights and involvement. The Gaelic-speaking population possesses a unique cultural identity, characterised by recognised traits of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. The lack of genuine engagement undermines the credibility of the assessment and neglects established principles of participation regarding cultural and environmental decisions.

A crucial procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority cannot meet its legal obligation to assess the social, cultural, and economic repercussions on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these inadequacies place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and spaces. The failure to consider both tangible and intangible heritage, alongside the lack of recognition for living cultural practices, signifies a clear deviation from policy requirements.

Ultimately, the combined failure to adequately evaluate living heritage, intangible cultural values, community rights, and statutory obligations creates a significant evidential gap. The cultural ramifications of the proposed development have not been thoroughly evaluated, leaving the application lacking a solid foundation for assessing 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 assessment of the visual impacts associated with the proposed turbines is significantly lacking and does not adequately capture the extent of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, undeveloped nature, and pronounced sense of remoteness. Introducing large-scale turbines near the shore would create a continuous industrial presence that would fundamentally alter this character and lead to a permanent transformation of the landscape.

Moreover, the application fails to represent the true magnitude of the visual changes. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, thus directly impacting visual amenity and undermining the naturalness and sense of remoteness that define the area. The assessment does not sufficiently communicate this level of impact or its significance within such a sensitive landscape context.

Concerns also arise regarding the methodology used to select and present visual viewpoints. Evidence indicates that these viewpoints may not accurately depict the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the visual impact has been understated, compromising the reliability of the assessment.

Additionally, there is a failure to assess the interconnected relationship between landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context linked to the Atlantic horizon through visual and spatial relationships. The assessment treats these sites as isolated entities rather than acknowledging their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the preservation of natural spaces and historic assets. The proposed changes are incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertion of policy compliance.

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

In conclusion, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and

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

## **FISHERIES AND MARINE LIFE**

The proposal presents significant shortcomings in its assessment of fisheries and marine life, failing to provide a thorough evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a 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 major disruption.

One critical concern is the assumption that fishing activities can be displaced without consequences. The application lacks evidence to confirm that alternative fishing grounds are available, accessible, or can sustain additional pressure. This is a serious oversight, as displacement could lead to overfishing in other areas and could have broader economic implications for the local fishing fleet. The absence of a clear and evidence-based assessment means that the potential impacts on fisheries and local livelihoods remain poorly understood.

Furthermore, the proposal introduces substantial risks to marine species, particularly due to underwater noise from construction activities. The use of high-energy hammer piling for extended periods is expected to cause disturbances over considerable distances, which could adversely affect species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises alarming issues, yet the application minimises the importance of these impacts without adequate supporting evidence.

Inconsistent statements within the application also raise concerns. While it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes the anticipated impacts as negligible. This contradiction undermines the credibility of the assessment and raises doubts about compliance with the Habitats Regulations, especially where harm is expected to occur at levels requiring legal authorisation.

Additionally, the assessment does not address cumulative impacts resulting from multiple pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately assessed.

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

In summary, the deficiencies in evidence regarding fishing displacement, the

underestimation of acoustic impacts, and the internal inconsistencies all contribute to an incomplete and unreliable assessment. These shortcomings hinder a robust evaluation of the impacts on marine life and fisheries.

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The assessment of the project lacks completeness, particularly concerning the onshore infrastructure, which fails to fully account for the impacts of what constitutes a single integrated project. The separate evaluations of the offshore turbines and onshore works result in a fragmented understanding of the environmental and socio-economic effects, obscuring the true scale of the project's overall impact.

Onshore elements of the project involve significant activities, including cabling that traverses protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure through sensitive landscapes. Notably, these works include excavation in areas of deep peat, especially within Barvas Moor, which serves as a vital carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, which prevents a comprehensive understanding of the project's environmental footprint.

The application's exclusion or deferral of onshore impact assessments hinders proper evaluation of cumulative effects. According to the Environmental Impact Assessment process, all project components must be evaluated collectively. However, the division between offshore and onshore assessments leads to an incomplete understanding of the combined impacts on peatlands, habitats, and surrounding communities.

Additionally, there are considerable risks posed to sensitive habitats, including machair systems and peatland environments that are protected by policy. The application does not clearly demonstrate that impacts on these habitats have been thoroughly assessed or that appropriate measures for avoidance have been implemented, resulting in a significant evidential gap regarding biodiversity protection.

Concerns also arise with respect to carbon balance. Disturbance of peatland has the potential to release stored carbon, leading to a carbon debt that may contradict the aims of renewable energy development. The application does not adequately address this issue or provide evidence that the overall carbon balance remains advantageous.

Furthermore, the routing of infrastructure through active croft land may create conflicts with existing land use and legal rights. There is insufficient evidence within the application to confirm that the necessary consents or processes have been initiated, prompting questions about deliverability and lawful implementation.

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

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

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The West Lewis coastline is renowned for its exceptionally dark skies, which are integral to the environmental quality, cultural identity, and tourism value of the area. The proposed development introduces permanent red aviation lighting, creating a continuous and intrusive "wall of light" effect across the western horizon. This change would fundamentally alter the night-time environment, yet the application fails to assess the impact of this lighting on visual amenity, landscape character, and the experience of residents and visitors. The omission is particularly concerning considering the significance of dark skies for the region's identity and the potential for growth in sectors such as astro-tourism.

Furthermore, there is no evaluation regarding the impact on nocturnal wildlife. Sensitive species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, face disorientation and increased risk of collision due to artificial lighting. The absence of any lighting impact assessment or phototaxis study means that the application neglects to consider how aviation lighting may affect these species or lead to increased mortality rates. Additionally, the reliance on daytime survey data in the ornithological assessment fails to capture the nocturnal activities and associated risks of species like Kittiwakes, which may forage or migrate at night and are similarly vulnerable to disorientation from artificial lighting. The lack of site-specific night-time data results in a significant gap in understanding the ecological impacts.

Without a thorough assessment of these nocturnal effects, it remains impossible to ascertain whether protected species or designated sites could be adversely impacted. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, thereby engaging the precautionary principle and preventing a lawful determination. From a policy standpoint, this omission contradicts the National Planning Framework 4, which emphasises the protection of natural places and environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the night-time character is a vital part of the environment.

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

## **TOURISM**

The application overlooks the critical assessment of tourism impacts, failing to evaluate the economic and social implications for a vital sector of the Isle of Lewis

economy. Tourism relies heavily on the region's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Despite the application noting that 86% of visitors are attracted by scenery, it lacks a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or overall economic contributions.

Tourism has experienced considerable growth, increasing from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. Nevertheless, the application does not evaluate how the industrialisation of the seascape and the potential loss of environmental quality could affect Tourism Gross Value Added or the wider economic resilience of the area. Without such vital analysis, it remains unclear whether the proposed development would yield a net economic benefit or potentially harm an established and expanding sector.

Furthermore, the assessment neglects to address the importance of environmental quality in enhancing tourism, particularly the significance of unspoiled landscapes and dark skies for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this deficiency, creating a substantial gap in understanding the impacts on a recognized and growing aspect of the local economy.

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

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

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

## **SUMMARY**

The proposal for the Spiorad na Mara Offshore Wind Farm starkly fails to meet the criteria for sustainable development when measured against statutory duties and national policy. It echoes the critical issues that led to the denial of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was established. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland conservation, landscape integrity, and community wellbeing, the application presents serious deficiencies.

There are significant gaps in the evidential basis required for determining the proposal. The use of an undefined design envelope, reliance on unspecified mitigation measures, and crucial omissions in baseline data regarding nocturnal wildlife, full onshore infrastructure, and tourism impacts leave the Environmental Impact Assessment incomplete. This incompleteness hinders a comprehensive understanding of the likely significant effects or residual impacts that may arise from the project.

Procedural failures are also evident in this application. The lack of a compliant Island Communities Impact Assessment constitutes a breach of the statutory obligations outlined in the Islands (Scotland) Act 2018. Furthermore, the failure to provide the full Social Impact Assessment is a significant omission. These shortcomings impede the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

The proposal conflicts directly with National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural areas, and cultural heritage. Additionally, there is no assurance that health and wellbeing impacts are acceptable, and the absence of tourism impact modelling undermines claims of a net economic benefit. The failure to adequately assess the cumulative effects of both offshore and onshore elements obscures potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertain and potentially significant environmental risks persist due to incomplete assessments of marine ecology, seabirds, protected species, and marine mammals. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing any lawful determination that impacts would be acceptable.

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

In summary, the application is fundamentally flawed both procedurally and substantively. The overwhelming scale of information gaps, coupled with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision-making process. Therefore, it is essential that the competent authority either refuse consent based on these grounds or invoke the appropriate regulatory measures to ensure that the missing information is submitted.

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

### **Additional Comments**

I am against such big construction as I think they spoil the country side. They also interfere with wild life habitats.

**Yours faithfully,**

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: ECFC736E

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

**Dear Sir/Madam**

This representation serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. Situated off the west coast of the Isle of Lewis, an area characterised by its Atlantic-facing coastline and strong cultural heritage, the proposed development raises critical issues regarding its alignment with statutory obligations, national policy, and the fundamental principles of sustainable development.

The application does not present an adequate evidential foundation for a lawful determination. There is a notable absence of essential environmental data, and the baseline information provided is both limited and inconsistent. Several key elements of the proposal remain undefined. Furthermore, the adoption of a flexible design framework obstructs a clear comprehension of the likely significant effects, while the reliance on unspecified mitigation measures precludes an assessment of their potential effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidential support.

There are pronounced and substantive conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and overall health and wellbeing. It does not adequately demonstrate compliance with national obligations to preserve biodiversity, address climate considerations, and uphold environmental integrity. These discrepancies directly challenge the statutory criteria necessary for consent and hinder the competent authority's capacity to determine the acceptability of the development from a policy perspective.

The unprecedented scale of the proposal, characterised by large turbines positioned in close proximity to the shore, raises substantial concerns about landscape capacity, visual impact, and broader environmental consequences. Collectively, the lack of sufficient information, the reliance on undefined mitigation strategies, the evidential inadequacies, and the clear policy non-compliance indicate that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must be invoked.

**ASSESSMENT OF ALTERNATIVES**

The application lacks a robust assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a

well-structured and reasoned comparison of viable alternatives based on their environmental effects, it presents a narrative account of how the project evolved. This approach does not adequately show that less harmful options have been properly identified, evaluated, and preferred over more damaging solutions.

There is a significant absence of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Notably, the proposal does not indicate that the developer has genuinely considered positioning the turbines further offshore, where the potential visual, ecological, and coastal impacts would likely be lessened. Given the sensitivity of the West Lewis coastline and the critical role of proximity to the shore in assessing impact, the failure to include this analysis undermines any assertion that the proposed siting is the least damaging option.

The shortcomings are also evident in the cable routing and landfall assessment, where there is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors. This includes significant areas of cultural and spiritual importance, such as Barvas Cemetery. The lack of a clear avoidance strategy, along with insufficient comparative analysis, suggests that mitigation through design has not been effectively applied, leading to an over-reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This reflects a failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether less harmful and more suitable alternatives are available. In the absence of a thorough alternatives assessment, it is impossible to conclude that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency compromises adherence to National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a material omission that significantly contributes to the conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The assessment conducted regarding marine ecology and protected species demonstrates significant deficiencies and fails to deliver a complete and reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is characterised as a highly sensitive and biologically active marine system. However, the baseline data collected is incomplete, and the methodologies employed do not adequately capture species presence, behaviour, and habitat usage. Consequently, the assessment lacks a sound evidential basis for evaluating potential impacts.

Notably, the application omits crucial information related to otters, which are classified as a European Protected Species. It does not adequately recognise or assess their active utilisation of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns undermines any conclusions drawn regarding the potential effects of construction disturbance, noise, and increased activity, leading to an inadequate assessment of significant effects on this species.

Furthermore, the evaluation of basking sharks is similarly flawed. The reliance on aerial surveys introduces a significant detection bias, particularly under Atlantic conditions, which is likely to result in an underestimation of their presence. This issue is particularly pronounced when compared to established land-based observations that indicate frequent usage of these waters. The omission of such data further contributes to an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological shortcomings imply that conclusions asserting negligible or non-significant effects are based more on assumptions rather than robust evidence. The lack of sufficient baseline data also obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the actual scale of risk posed to marine species and their habitats.

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

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions results in an unreliable assessment. These shortcomings hinder a thorough evaluation of the impacts on marine ecology and protected species, ultimately leading to the overall determination that the application does not possess a sufficient evidential foundation.

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The application presents an ornithological assessment that is fundamentally flawed, revealing significant gaps in evidence and internal inconsistencies that cast doubt on its conclusions. Situated on the west coast of the Isle of Lewis, an area known for its internationally important seabird populations, the proposed development fails to adequately demonstrate that these species, many of which are already in decline, will not face adverse effects. Critical foraging areas and migratory pathways are located within the development site, yet the assessment does not thoroughly evaluate the risks of displacement, collision, or habitat loss.

There exists a glaring contradiction in the application. While the developer asserts there will be no significant adverse effects, they simultaneously put forth a Habitats

Regulations derogation case, which should only be necessary where significant harm is anticipated. This inconsistency raises serious concerns about the assessment's reliability, suggesting that the conclusions drawn are unsupported by the evidence provided. Furthermore, there is a lack of sufficient evidence to conclude that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The assessment does not fully account for the critical importance of these feeding grounds, and the reliance on modelling methods creates uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. Methodological shortcomings may lead to an underestimation of mortality, especially in areas where baseline data is lacking and where the behavioural responses of species are not comprehensively understood.

The placement of turbines within a recognised migratory corridor introduces a substantial risk, acting as a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application inadequately assesses the long-term consequences of sustained mortality in this corridor and the potential impacts on species that possess relatively small global populations. From a regulatory standpoint, the application does not meet the evidential standards necessary to affirm no adverse effects on the integrity of protected sites. The combination of contradictory conclusions, data deficiencies, and limitations in modelling means the standard of being beyond reasonable scientific doubt has not been satisfied. This situation invokes the precautionary principle, preventing a lawful conclusion that supports consent.

Moreover, the identified deficiencies represent a failure to adhere to National Planning Framework 4 regarding the protection of biodiversity and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and lack of robust evidence. As a result, it ultimately fails to meet the statutory requirements necessary for a valid determination.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

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

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

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

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

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

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

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

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

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

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

the visual impact, calling into question the reliability of its findings.

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

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This change represents not just a visual impact, but also a broader cultural and spatial harm that has not been sufficiently evaluated in the application. From a policy standpoint, the proposal is at odds with National Planning Framework 4, which aims to protect natural places and historic assets. The scope of change proposed is incompatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of compliance with policy.

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

## **CONSTRUCTION AND POLLUTION RISKS**

The assessment of construction and pollution risks associated with the proposal is notably deficient and lacks the necessary detail to evaluate potential environmental effects adequately. The initiative necessitates significant seabed preparation and installation work in a high-energy Atlantic setting, yet it does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application is predicated on the future preparation of mitigation and contingency measures post-consent, thereby obstructing any meaningful assessment of their potential adequacy or effectiveness.

This reliance on unspecified future measures is particularly troubling given the sensitivity of the environment receiving these works. The West Lewis coastline is known for its clean coastal waters and critical habitats, which are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as the mobilisation of sediments and the possibility of accidental chemical or oil spills, it fails to offer sufficient details on the strategies for preventing, controlling, or monitoring these risks.

Moreover, there exists 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 impacts of these disturbances. This uncertainty extends to the potential effects on marine species and habitats that have already been recognised as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By deferring the development of contingency plans until after consent has been granted, the application hinders an evaluation of whether adequate safeguards are in place to manage pollution incidents. This introduces procedural risks and diminishes the capability of the competent authority to assess environmental protection measures at the point of decision-making.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is required that likely significant effects and mitigation strategies be evaluated prior to granting consent. The absence of such information precludes a lawful determination. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

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

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The application raises substantial concerns regarding the integrity of its assessment, particularly in relation to the onshore infrastructure, which remains materially incomplete. This approach treats the offshore turbines and onshore works as separate entities, which obscures the full scope of the environmental and socio-economic effects associated with what is fundamentally a single integrated project.

One of the critical components of the onshore works involves the routing of cabling across protected moorland and the construction of a substation in proximity to Stornoway. This activity necessitates excavation across areas rich in deep peat, notably within Barvas Moor, an ecologically sensitive habitat that serves as a significant carbon store. However, the application fails to provide a thorough assessment of these impacts, thereby inhibiting a complete understanding of the project's environmental footprint.

The omission or postponement of onshore impact assessments results in an inability to accurately evaluate cumulative effects. The Environmental Impact Assessment process mandates that all project components be assessed together; yet, the current separation of offshore and onshore elements means that the combined impacts on

peatlands, habitats, and local communities remain inadequately understood.

Moreover, there are notable risks posed to sensitive habitats, including machair systems and peatland environments, which receive policy protection. The application does not sufficiently demonstrate that the impacts on these habitats have been thoroughly evaluated or that appropriate avoidance measures have been implemented. This deficiency signifies a significant evidential gap in terms of biodiversity protection.

The proposal also raises important issues related to carbon balance. The disturbance of peatland can lead to the release of stored carbon, potentially creating a carbon debt that contradicts the fundamental goals of renewable energy development. The application does not sufficiently address this concern or prove that the overall carbon balance remains advantageous.

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

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

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

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The Environmental Impact Assessment lacks an assessment of dark skies and nocturnal wildlife, representing a significant omission. 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 introduction of permanent red aviation lighting will create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

There is no evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the role of dark skies in the area's identity and the potential growth of astro-tourism. The lack of consideration for these impacts creates a notable gap in the overall landscape and environmental assessment.

Furthermore, the proposal does not assess the effects of artificial lighting on nocturnal wildlife. Sensitive species such as Manx Shearwater, European Storm Petrel, and

Leach's Storm Petrel are at risk of disorientation and collision due to phototaxis, yet the application omits any lighting impact assessment or phototaxis study. This means there is no analysis of how aviation lighting might affect these species or contribute to increased mortality.

The reliance on daytime survey data in the ornithological assessment fails to capture nocturnal activity and associated risks. Species like Kittiwakes, which may forage or migrate at night, also face the risk of disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data leaves a critical gap in understanding ecological impacts.

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

From a policy standpoint, these omissions contradict National Planning Framework 4 regarding the protection of natural places and environmental quality. This failure also undermines the overall assessment of landscape and seascape impacts, as night-time character is a vital component of the environment.

In summary, the complete absence of assessments concerning dark skies and nocturnal wildlife results in a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis makes the application incomplete and unfit to support a lawful determination.

## SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the criteria for sustainable development, as it does not align with statutory duties, national policy, or evidential standards. It mirrors the significant issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This new application comes under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

There is a concerning lack of a comprehensive and reliable evidential basis for the application. Key data is missing, the design envelope remains undefined, and unspecified mitigation measures rely on assumptions rather than concrete plans. Furthermore, vital impact pathways, such as effects on nocturnal wildlife, comprehensive onshore infrastructure, and tourism, have not been addressed. Consequently, the Environmental Impact Assessment is inadequate, failing to elucidate the likely significant effects or residual impacts.

The process surrounding this proposal is also flawed. The lack of a compliant Island Communities Impact Assessment breaches statutory requirements under the Islands (Scotland) Act 2018, while the failure to present a complete Social Impact Assessment

is a significant omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for approval.

In addition, the proposal contradicts National Planning Framework 4 by not adequately protecting biodiversity, natural areas, or cultural heritage. It does not demonstrate acceptable health and wellbeing impacts and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly evaluated, leaving uncertainties regarding impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project remain ambiguous and potentially substantial. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and at times inconsistent. The evidence provided does not meet the threshold required to exclude adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle and complicating any lawful conclusion regarding acceptable 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 connections, and negative effects on tourism represent enduring changes that cannot be adequately mitigated.

In summary, the application is fundamentally flawed both procedurally and substantively, with significant deficiencies in information, conflicts with policy, and unresolved environmental risks. These factors hinder the ability to make a lawful, evidence-based decision. The competent authority is urged to refuse consent for the Spiorad na Mara Offshore Wind Farm application in its entirety or to invoke regulatory provisions to obtain the missing information.

### **Additional Comments**

Although generally supportive of renewable projects I have concerns about the scale of the N4 scheme and its location so close to the coastline of the Isle of Lewis. There will clearly be an environmental impact of such a huge turbines (and associated infrastructure) as well visual and noise impacts on local residents. I would ask that there is a pause whilst the impact of not just N4 but all developments across the islands are considered and that smaller alternative schemes are considered

**Yours faithfully,**

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: C609E523



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

**Dear Sir/Madam**

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which is submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a comprehensive review of the Environmental Impact Assessment Report and the associated documentation, revealing material deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, nearly pristine environment, and significant cultural identity. Concerns regarding its compliance with statutory requirements, national policy, and the principles of sustainable development arise from the proposal's scale, proximity, and design.

The application lacks an adequate evidential foundation necessary for a lawful determination. There is a notable absence of critical environmental data, while baseline information is both limited and inconsistent. Additionally, key elements of the proposal are not clearly defined. The flexible design framework employed obscures a clear understanding of the likely significant effects, and the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the provided documentation fails to offer a comprehensive or informed view of the environmental, cultural, or community impacts, leading to unsupported claims of negligible or non-significant effects.

The proposal presents clear and substantial conflicts with existing policy. It appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. Furthermore, the application does not demonstrate that it can meet national obligations regarding biodiversity protection, climate interests, and environmental integrity. These inconsistencies directly affect the statutory tests required for consent, compromising the competent authority's ability to conclude that the development is acceptable according to policy.

In this location, the scale of the proposal is unprecedented, with large turbines positioned near the shoreline, which raises significant concerns about landscape capacity, visual dominance, and environmental impacts. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and evident 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 application exhibits significant evidential deficiencies, highlighted by gaps in baseline data, limitations in methodology, and an overreliance on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and significance of impacts, particularly in instances where negligible or non-significant effects are claimed without robust supporting data. The lack of adequate information hinders a clear comprehension of cumulative and worst-case impacts, introducing a level of scientific uncertainty that fails to align with statutory requirements.

Moreover, the proposal does not adequately demonstrate compliance with National Planning Framework 4. The requirements related to biodiversity protection and environmental integrity cannot be satisfied as the assessment does not illustrate that impacts have been thoroughly examined or that necessary safeguards are established. The application seeks consent based on a reliance on unarticulated mitigation measures, monitoring strategies, and management plans that remain undefined. This approach results in an evaluation that is procedurally unacceptable, as it conflicts with the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies must be clearly determined before a decision is made.

The Environmental Impact Assessment Report is materially deficient and fails to deliver a full, transparent, or reliable account of the likely environmental effects associated with the proposal. The application's use of a flexible Project Design Envelope, devoid of commitment to specific turbine dimensions, layouts, or configurations, contributes to considerable uncertainty and hampers the consistent application of a worst-case scenario. This undermines the integrity of the assessment and precludes both the public and the competent authority from comprehending the true extent of environmental effects.

Consequently, the application does not satisfy the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. Collectively, the reliance on an undefined design envelope, the absence of specified mitigation, and the deficiencies in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and rigorous assessment of environmental effects, ultimately leaving the competent authority unable to determine the application based on the information provided.

## **ASSESSMENT OF ALTERNATIVES**

The application lacks a structured and evidence-based assessment of alternatives, failing to meet the statutory requirements set by the Environmental Impact Assessment regime. Instead of offering a detailed comparison of realistic alternatives based on their environmental impacts, the submission merely recounts the project's development history. This narrative approach does not convincingly show that less harmful options

have been identified, evaluated, and chosen over more damaging alternatives.

There is a notable absence of transparent comparisons regarding alternative offshore sites, development scales, or design configurations. Specifically, the application does not indicate that the developer has thoroughly considered placing turbines further offshore, which could potentially lessen visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical role of proximity to shore in assessing impact, the lack of such analysis raises significant concerns about whether the proposed location is indeed the least damaging option available.

This inadequacy extends to the evaluation of cable routing and landfall options, where there is insufficient evidence that alternative paths have been adequately considered to prevent or lessen impacts on sensitive areas. These include culturally and spiritually significant sites such as Barvas Cemetery. The failure to implement a clear avoidance strategy, along with the absence of comparative analysis, suggests that mitigation through design has not been effectively employed, leading to an overreliance on post-design mitigation measures.

Consequently, the application does not satisfactorily demonstrate that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This represents a significant deviation from the established mitigation hierarchy, making it impossible for the competent authority to ascertain whether more appropriate and less harmful alternatives are available. Without a thorough assessment of alternatives, one cannot conclude that the proposal aligns with sustainable practices or complies with relevant policies.

From a policy standpoint, this shortfall undermines adherence to the National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The failure to provide a systematic and comparative assessment is a critical deficiency that leads to the conclusion that the application has not been sufficiently evaluated and thus 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, leading to a lack of reliable understanding of ecological receptors. This area is characterised by a highly sensitive and biologically active marine system, yet the baseline data provided is incomplete. The methodologies employed fail to adequately capture the presence, behaviour, and habitat use of various species, resulting in an unreliable evidential basis for evaluating potential impacts.

A significant oversight in the assessment is the failure to properly recognise and evaluate the presence of otters, a European Protected Species. The application does not account for their active use of coastal areas for foraging and movement, neglecting to consider their core foraging range and behavioural patterns. Consequently, the

potential impacts of construction disturbance, noise, and increased activity on this species have not been sufficiently assessed, undermining any conclusions regarding the absence of significant effects.

The assessment of basking sharks also exhibits serious deficiencies, primarily due to a reliance on aerial surveys, which introduces substantial detection bias, especially under Atlantic conditions. This method is likely to underestimate the presence of these sharks, particularly when compared to established land-based observations that show frequent use of these waters. The failure to incorporate or properly consider such data leads to an incomplete baseline and compromises the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects that are based more on assumptions than on solid evidence. The lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the true scale of risk posed to marine species and their habitats.

From a regulatory standpoint, the application fails to comply with the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4, as it does not adequately identify or assess protected species. The level of uncertainty generated prevents the dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions makes the assessment unreliable. These shortcomings hinder a thorough evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application does not rest on a sufficient 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 is a living cultural landscape where environment, language, tradition, and community are deeply interconnected. However, the assessment of cultural heritage and community identity is fundamentally inadequate. It adopts a reductive approach that treats heritage as a collection of isolated, static assets, ignoring their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites remain active places of burial and spiritual practice, yet they are mischaracterised as static features in the assessment. This failure to consider their continued use and the implications of development on their setting leads to an incomplete evaluation of cultural effects and neglects their importance in community life.

Moreover, the assessment overlooks intangible cultural heritage, including the Gaelic

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

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

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

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. The neglect to consider both tangible and intangible heritage and the failure to recognise living cultural practices represent a clear departure from policy requirements.

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

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The lack of transparency regarding the Social Impact Assessment raises significant concerns about the lawful evaluation of social impacts, health, and wellbeing associated with the proposed development. Although the developer engaged local residents through focus groups, the full report of this assessment remains unpublished, creating a substantial evidential gap. This absence impedes both public understanding and the competent authority's ability to grasp the full scope of social risks revealed by the developer's own research.

Summaries suggest that local residents are experiencing notable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts, derived from direct engagement with the community, are factual rather than speculative. However, the non-disclosure of the complete assessment restricts proper examination of the findings and hampers the determination of their relevance within the decision-making process.

Moreover, there is recognition that the proposal poses a perceived threat to community identity and cohesion, with findings indicating potential "cultural loss." Despite this identification, such impacts have not been fully incorporated into the main application nor given the appropriate consideration they warrant. The failure to provide the entire Social Impact Assessment effectively obscures the genuine human and social costs associated with the development.

This deficiency in transparency significantly undermines the Environmental Impact Assessment process. An exhaustive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functionality may be adversely influenced. The lack of a complete dataset in the application fails to provide a comprehensive evidential basis for evaluating the balance between potential benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development projects are required to foster positive health outcomes while mitigating adverse effects; however, the existing evidence suggests negative impacts that remain inadequately disclosed. Without access to the full assessment, compliance with these policy requirements cannot be substantiated.

The procedural ramifications are considerable, as the competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This omission constitutes a material shortfall within the application and reflects a failure to satisfy the evidential standards of the Environmental Impact Assessment framework.

In summary, the withholding of the full Social Impact Assessment, in conjunction with the documented evidence of existing negative impacts, results in an incomplete and unreliable evaluation. This situation precludes a lawful determination and supports the conclusion that the application lacks sufficient information to proceed.

### **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

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

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

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

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

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

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

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

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

## **CONSTRUCTION AND POLLUTION RISKS**

The proposal lacks a comprehensive assessment of construction and pollution risks, which is essential for understanding the environmental effects. It involves considerable seabed preparation and installation works in a high-energy Atlantic environment, yet there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application suggests that mitigation and contingency measures will be created after consent is granted. This approach prevents a proper assessment of their sufficiency or effectiveness.

There are significant concerns about relying on undefined measures, especially considering the delicate nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disturbance and contamination. Although the application notes risks such as sediment mobilisation and potential chemical or oil spills, it does not provide adequate information on how to prevent, control, or monitor these issues.

Uncertainty remains regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without thorough modelling and clear management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also applies to potential consequences for sensitive marine species and habitats highlighted in the broader assessment.

Moreover, the lack of detailed emergency response procedures heightens these concerns. By postponing contingency planning until after consent, the application hinders the evaluation of whether suitable safeguards are in place to address pollution incidents. This introduces procedural risks and diminishes the ability of the competent authority to review environmental protection measures before making a decision.

From a regulatory standpoint, postponing essential environmental safeguards contradicts the requirements set out in the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to granting consent, and without this information, a lawful determination cannot be achieved. Additionally, the application does not prove compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, inadequate management plans, and uncertainty about potential impacts result in a materially deficient assessment. These issues obstruct a thorough evaluation of construction and pollution risks, further indicating that the application is incomplete.

## **FISHERIES AND MARINE LIFE**

The assessment surrounding fisheries and marine life associated with the proposal is inadequate and does not offer a thorough evaluation of ecological or socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and support a vital fishing industry. However, the application fails to adequately demonstrate that these habitats and uses can be preserved or maintained without causing significant disruption.

A critical concern is the presumption that fishing activities can be displaced without repercussions. There is no evidence provided within the application to suggest that alternative fishing grounds are available, accessible, or capable of absorbing the additional pressure. This lack of information is crucial, as the potential for displacement poses risks of overfishing in other areas, which could have broader economic implications for the local fishing fleet. Without a clear and evidence-based

assessment, understanding the impacts on fisheries and livelihoods remains elusive.

Moreover, the proposal brings forth considerable risks to marine species, particularly due to the underwater noise produced during construction. The extensive high-energy hammer piling anticipated is likely to disrupt marine life over significant distances, with particular concern for species such as dolphins. The predicted disturbance affecting a large portion of the local bottlenose dolphin population is alarming, yet the application minimizes the importance of these effects, lacking adequate supporting evidence.

There exists a notable inconsistency within the application, as it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously characterising these impacts as 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 a degree that warrants legal authorisation.

The assessment also neglects to evaluate the cumulative impacts resulting from multiple pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a holistic assessment 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 prove 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 consequences for marine biodiversity, which inhibits any conclusion regarding the sustainability of the proposal.

In summary, the deficiencies in evidence concerning fishing displacement, the minimisation of acoustic impacts, and internal contradictions collectively render the assessment incomplete and unreliable. These shortcomings obstruct a proper 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, creating a continuous and intrusive “wall of light” effect across the western horizon. This alteration will fundamentally change the night-time environment. There is a significant omission in the Environmental Impact Assessment regarding dark skies and nocturnal wildlife. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value. The failure to assess the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors is concerning, especially as dark skies are increasingly important to emerging tourism sectors such as astro-tourism.

Moreover, the proposal lacks an evaluation of the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel

are particularly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and a higher risk of collision. The application does not provide a lighting impact assessment or a phototaxis study, which leaves unaddressed how aviation lighting might affect these species or contribute to increased mortality rates.

The reliance on daytime survey data in the ornithological assessment further exacerbates this issue, as it fails to capture nocturnal activity or the associated risks. Other species, including Kittiwakes, may forage or migrate at night and are also vulnerable to the disorienting effects of artificial lighting, yet this risk has not been evaluated. The absence of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

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

From a policy standpoint, this omission conflicts with National Planning Framework 4, which concerns the protection of natural places and environmental quality. It also undermines the comprehensive assessment of landscape and seascape impacts, as night-time character is a crucial component of the environment. Collectively, the lack of any assessment regarding dark skies and nocturnal wildlife represents a significant evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and unable to support a lawful determination.

## **SUMMARY**

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the necessary standards for sustainable development as dictated by statutory duties and national policy. This proposal mirrors the fundamental issues that led to the rejection of the Lewis Wind Power application in 2008, which was deemed unacceptable due to the excessive scale of industrialisation. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application remains deficient.

It lacks a comprehensive and reliable evidential basis for assessment. Key gaps in baseline data and an undefined design envelope are significant concerns, compounded by the reliance on unspecified mitigation measures. Furthermore, crucial impact pathways—including nocturnal wildlife, full onshore infrastructure, and tourism effects—are notably absent from the assessment. This results in an Environmental Impact Assessment that is incomplete, preventing a thorough understanding of the likely significant effects or residual impacts.

There are evident procedural shortcomings. The absence of a compliant Island Communities Impact Assessment violates statutory duties outlined in the Islands

(Scotland) Act 2018, while the failure to disclose the complete Social Impact Assessment constitutes a significant omission. Such gaps inhibit the competent authority's ability to evaluate the potential effects on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

In addition, the proposal conflicts directly with the National Planning Framework 4, as it does not sufficiently safeguard biodiversity, natural landscapes, or cultural heritage. It fails to demonstrate that health and wellbeing impacts are manageable and lacks evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of the offshore and onshore components have not been adequately evaluated, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounding environmental risks remains significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The evidential threshold required to rule out adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and prevents lawful determination of the proposal's acceptability.

Moreover, the application would lead to considerable and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the erosion of dark skies, disruption of cultural and visual connections, and negative implications for tourism present permanent effects that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, alongside conflicts with policy and unresolved environmental risks, obstruct a lawful, evidence-based decision. Therefore, I formally request that consent for the Spiorad na Mara Offshore Wind Farm application 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: DF7B3812

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

**Dear Sir/Madam**

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under relevant marine licensing and Environmental Impact Assessment frameworks. Upon reviewing the Environmental Impact Assessment Report and accompanying documentation, it is evident that there are significant deficiencies across various dimensions, including planning, environmental, cultural, and procedural aspects. The project 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 heritage. The scale and design of the proposed development, particularly its proximity to the shoreline, raise essential questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential foundation for a lawful decision. There are notable omissions of critical environmental data, limited and inconsistent baseline information, and several key elements of the proposal remain undefined. The use of a flexible design framework hinders a clear assessment of likely significant effects, while the reliance on unspecified mitigation measures makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the impacts on the environment, culture, and community, and assertions of negligible or non-significant effects are not substantiated by credible evidence.

Furthermore, there are clear and significant conflicts with established policies. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and public health and wellbeing. It does not adequately demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. Such conflicts are pivotal to the statutory tests necessary for consent and hinder the ability of the competent authority to determine the development's acceptability in terms of policy.

The unprecedented scale of this proposal in this location, combined with the placement of large turbines in close proximity to the shoreline, raises serious concerns regarding landscape capacity, visual impact, and environmental consequences. Taken collectively, the absence of sufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and clear non-compliance with policy reflect that the application is incomplete and insufficient for lawful consideration. In light of these factors, the precautionary principle must be invoked.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

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

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

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

As a result, the application does not meet the evidential criteria set by the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to show compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, lack of specified mitigation measures, and deficiencies in baseline data renders the Environmental Impact Assessment Report incomplete and unreliable. These flaws impede a lawful and comprehensive evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The application presents a significant deficiency in its assessment of marine ecology and protected species, leading to an unreliable understanding of ecological receptors in the West Lewis coastal environment. This area is known for its biological activity and sensitivity, yet the baseline data provided is incomplete. The methodologies used fail to capture the presence, behaviour, and habitat usage of the species accurately, which

compromises the evidential foundation necessary for evaluating potential impacts.

One notable oversight is the treatment of 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. By neglecting to assess their core foraging range and behavioural patterns, the potential effects of construction-related disturbance, noise, and increased activity on otters are not properly evaluated. This lack of consideration undermines any assertions regarding the absence of significant effects on this species.

The assessment also inadequately addresses basking sharks, where reliance on aerial surveys leads to substantial detection bias, particularly in challenging Atlantic conditions. This method is likely to result in an underestimation of the species' presence, especially when compared to land-based observations that indicate regular use of these waters. The failure to incorporate or adequately analyse such pertinent data leads to an incomplete baseline, further weakening the reliability of the conclusions drawn.

Due to these methodological shortcomings, the conclusions regarding negligible or non-significant effects are based more on assumptions than on solid evidence. The insufficient baseline data also hinders meaningful assessments of cumulative and indirect impacts, including those arising from seasonal variations and broader ecosystem interactions. This lack of clarity raises concerns about the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria established by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty created by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Consequently, the granting of consent under these circumstances would not be lawful.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These shortcomings inhibit a comprehensive evaluation of impacts on marine ecology and protected species, ultimately leading to the assertion that the application lacks an adequate evidential basis.

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The application presents significant deficiencies in the ornithological assessment, raising substantial concerns about its reliability. The conclusions drawn are undermined by internal inconsistencies and gaps in evidence. Notably, the west coast of the Isle of Lewis is home to internationally important seabird populations that are already experiencing declines, yet the application fails to satisfactorily demonstrate that these species will not be adversely impacted. The proposed development is sited within critical foraging areas and migratory pathways, yet the assessment inadequately

considers the potential consequences of displacement, collision risk, or habitat loss.

A significant contradiction is evident, as the developer asserts that no significant adverse effects will occur, while also advancing a Habitats Regulations derogation case, which is only warranted in situations where significant harm is anticipated. This inconsistency casts doubt on the assessment's reliability and suggests that its conclusions are not substantiated by adequate evidence. Furthermore, the assessment does not convincingly show that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not thoroughly evaluated, and the reliance on modelling techniques introduces a level of uncertainty, particularly for declining species such as Kittiwakes and Fulmars. The methodologies utilised may underestimate mortality rates, especially given incomplete baseline data and insufficient understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional significant risk, effectively acting as a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term impacts of sustained mortality within this corridor or the potential consequences for species that have relatively small global populations.

From a regulatory standpoint, the evidential threshold necessary to assert no adverse effect on the integrity of protected sites is not met. The presence of contradictory conclusions, alongside data gaps and limitations in modelling, indicates that the requisite standard of beyond reasonable scientific doubt has not been satisfied. This situation engages the precautionary principle, precluding a lawful conclusion that would support consent.

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

In summary, the assessment's internal inconsistencies, methodological weaknesses, and insufficient evidence render it unreliable. These failings hinder a thorough evaluation of impacts and lead to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The proposed development presents significant shortcomings in the assessment of cultural heritage and community identity, particularly regarding the West Lewis coastline, which embodies a living cultural landscape. This landscape intricately weaves together environment, language, tradition, and community, yet the application reduces heritage to mere isolated, static assets, failing to acknowledge their dynamic social, cultural, and spiritual functions within the community.

A notable failure within the assessment is the handling of culturally significant sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial sites and places for spiritual practice, but the assessment incorrectly categorises them as static features. This oversight neglects their ongoing use, meaning, and the potential impact of development on their setting, resulting in an incomplete evaluation of cultural effects and an omission of their vital role in community life.

Moreover, the application does not address intangible cultural heritage, such as the Gaelic language and traditions, or the historical relationship between the community and the coastal environment. These elements are crucial to the area's identity yet are entirely overlooked in the assessment, which is a significant omission. Without including these factors, the true cultural impact of the development remains inadequately understood.

Concerns also arise regarding the rights and engagement of the community. The Gaelic-speaking population, recognised for its distinct cultural identity as 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 disregards established principles for participation in decisions that affect cultural and environmental interests.

Furthermore, there is a critical procedural gap due to the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The lack of this assessment prevents the competent authority from fulfilling its legal obligation to assess the social, cultural, and economic impacts on the island community, rendering a lawful determination unattainable.

From a policy perspective, these inadequacies place the proposal at odds with the National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, along with the failure to recognise living cultural practices, constitutes a clear deviation from policy requirements.

Overall, the combined failure to assess living heritage, intangible cultural values, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application falls short of providing a robust basis for understanding the true cultural cost involved.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The developer commissioned a Social Impact Assessment that included focus groups with local residents, but the full report has not been made public. This lack of disclosure creates a significant evidential gap, hindering both the public and the competent authority from understanding the full extent of social risks identified by the developer's own research. Available summaries suggest that residents are already feeling stress, anxiety, and concern due to the scale and proximity of the proposal.

These impacts arise from direct engagement, not speculation. However, without access to the complete assessment, proper scrutiny of these findings is not possible, which limits the ability to evaluate their significance in the decision-making process.

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

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

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

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The assessment of visual, landscape, and seascape impacts is significantly flawed, failing to capture both the extent of change and the sensitivity of the environment. The West Lewis coastline is characterised by an expansive Atlantic horizon, a lack of development, and a strong feeling of remoteness. The addition of large-scale turbines near the shore would establish a persistent and overwhelming industrial presence, fundamentally transforming this unique character and leading to a permanent alteration of the landscape.

Moreover, the application does not sufficiently depict the scale of the visual changes anticipated. The size and closeness 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 within such a sensitive landscape.

Methodological issues also arise regarding the choice and presentation of visual

viewpoints. Evidence suggests that the viewpoints selected may overlook the most sensitive receptors or fail to address worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This could result in an underestimation of visual impact, calling into question the credibility of the assessment.

Another significant oversight is the lack of evaluation regarding the interconnectedness of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape setting that visually and spatially relates to the Atlantic horizon. The assessment fails to acknowledge their interdependence, treating them as isolated assets, which leads to an incomplete understanding of the impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 concerning the safeguarding of natural areas and historic assets. The degree of change proposed is inconsistent with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of policy compliance.

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

In summary, the assessment fails to accurately depict the magnitude of impact, the sensitivity of the environment, and the intertwined nature of landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

## **CONSTRUCTION AND POLLUTION RISKS**

The assessment 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.

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The assessment of the onshore infrastructure is lacking and does not fully consider the impacts of what constitutes a single integrated project. The offshore turbines and onshore works are closely linked but assessed separately, leading to a fragmented evaluation that masks the true extent of the environmental and socio-economic effects.

Key onshore components include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. These activities require excavation through areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive habitat. The application fails to offer a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By neglecting to assess the onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components be considered collectively; however, the disconnection between offshore and onshore elements leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

Moreover, the proposal presents substantial risks to sensitive habitats, such as machair systems and peatland environments, which benefit from policy protection. The application does not sufficiently demonstrate that impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been implemented, creating a significant evidential gap regarding biodiversity protection.

Concerns also arise about carbon balance, as the disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy development. The application does not adequately address this critical issue or prove that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, raising serious doubts about deliverability and lawful implementation.

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

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

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The West Lewis coastline is known for its exceptionally dark skies, which contribute significantly to the area's environmental quality, cultural identity, and tourism potential. However, the Environmental Impact Assessment neglects any examination of dark skies and nocturnal wildlife, marking a substantial omission. The proposed development includes permanent red aviation lighting that would be visible over long distances, leading to a continuous and intrusive "wall of light" effect across the western horizon. This alteration would fundamentally change the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This lack of assessment is particularly concerning given the growing importance of dark skies to local identity and emerging sectors like astro-tourism. Consequently, there is a significant gap in the

overall assessment of the landscape and environment.

Moreover, the proposal does not address potential impacts on nocturnal wildlife. Species such as 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 an increased risk of collision. The absence of any lighting impact assessment or phototaxis study means that the application fails to consider how aviation lighting may impact these species or contribute to mortality rates.

The situation is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which overlooks nocturnal activity and associated risks. Kittiwakes, for example, may forage or migrate at night and are also at risk of disorientation caused by artificial lighting, yet this risk has not been investigated. The lack of site-specific night-time data leads to a critical deficiency in understanding ecological impacts.

Without a proper assessment of nocturnal effects, it is impossible to determine whether protected species or designated sites could face 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 hindering lawful determination.

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

In summary, the lack of any assessment regarding dark skies and nocturnal wildlife presents a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis indicates that the application is 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**

I can't trust this is best option

**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: 1931A898

**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 regimes. The proposal raises serious concerns regarding its alignment with statutory requirements, national policy, and sustainable development principles. It is located off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The application lacks an adequate evidential basis for lawful determination, as it omits critical environmental data, and baseline information is both limited and inconsistent. Key elements of the proposal remain undefined, and the use of a flexible design framework obscures an understanding of likely significant effects. Furthermore, the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. This results in documentation that fails to provide a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible or non-significant effects unsupported by robust evidence.

There are also substantial policy conflicts to address. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements for protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests needed for consent and impede the competent authority's ability to deem the development acceptable in policy terms.

The proposal's scale is unprecedented for this region, with large turbines positioned close to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impacts. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and does not support a lawful determination. In light of these issues, the precautionary principle must be applied.

**ASSESSMENT OF ALTERNATIVES**

The proposal lacks a comprehensive assessment of alternatives, failing to satisfy the statutory requirements of the Environmental Impact Assessment regime. Instead of delivering a structured and reasoned comparison of feasible alternatives based on environmental consequences, the application merely outlines the project's evolution. This method does not adequately prove that less harmful options have been correctly identified, evaluated, and preferred over more detrimental solutions.

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

These shortcomings are evident in the assessments of cable routing and landfall, where insufficient evidence demonstrates that alternative routes have been properly considered to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a defined avoidance strategy and the absence of comparative analysis suggest that mitigation by design has not been employed, relying instead on post-design measures for mitigation.

Consequently, the application does not convincingly illustrate that environmental harm has been minimised through site selection, layout, and routing of infrastructure. This represents a breach of the established mitigation hierarchy and obstructs the competent authority from discerning whether less harmful and more suitable alternatives are available. In the absence of a rigorous assessment of alternatives, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency weakens adherence to National Planning Framework 4, especially concerning the safeguarding of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission, contributing to the overarching conclusion that the application has not undergone adequate scrutiny and cannot support a lawful determination.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The developer's commissioned Social Impact Assessment, which included focus groups with local residents, has not had its full report published, creating a significant evidential gap. This deficiency hinders both public understanding and the competent authority's ability to evaluate the full extent of social risks identified through the developer's research. Available summaries suggest that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These reported impacts stem from direct engagement with the community, affirming their validity rather than being speculative in nature. However, without access to the complete assessment, proper scrutiny of these findings is impossible, limiting the determination of their significance in the decision-making process.

Moreover, there is evidence to suggest that the proposal threatens community identity and cohesion, with the developer's own findings highlighting "cultural loss." Despite

this acknowledgement, these impacts have not been adequately integrated into the main application or assigned appropriate weight. The decision to withhold the full Social Impact Assessment obscures the true human and social costs associated with the development. This lack of transparency fundamentally undermines the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly where community character may be jeopardised.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. It is essential for developments to support positive health outcomes and mitigate harm, yet the available evidence points to existing adverse effects that remain undisclosed. Consequently, without the full assessment, the application cannot show compliance with this policy.

The procedural ramifications are considerable, as the competent authority cannot conduct a rigorous socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a material omission in the application and signifies a failure to meet the evidential standards required under the Environmental Impact Assessment regime. Collectively, the failure to disclose the full Social Impact Assessment, along with the evidence of existing adverse impacts, renders the assessment both incomplete and unreliable, preventing a lawful determination and reinforcing the conclusion that the application is unsupported by sufficient information.

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

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

The application inadequately represents the magnitude of the visual change. Due to the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would significantly impact visual amenity and erode the defining qualities of naturalness and remoteness. The level of impact and its significance in the context of such a sensitive landscape have not been properly conveyed.

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

Moreover, the application fails to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are linked by visual and spatial relationships to the Atlantic horizon. Treating these heritage assets as isolated entities neglects their interdependence and results in an incomplete assessment of impacts on their setting and cultural significance.

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

From a policy perspective, the proposal conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is inconsistent with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Additionally, the lack of a robust worst-case assessment further weakens any claim of policy compliance.

The identified impacts cannot be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resulting changes are fundamental and permanent, rather than capable of reduction to an acceptable level through mitigation.

In conclusion, 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.

## **SUMMARY**

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements of sustainable development, as assessed against statutory duties, national policy, and evidential standards. It echoes the core issues of the 2008 refusal of the Lewis Wind Power proposal, which was deemed unacceptable due to the scale of industrialisation. This current application is presented under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis for the determination of this application. The reliance on an undefined design envelope, unspecified mitigation measures, and the absence of key impact pathways, including nocturnal wildlife and full onshore infrastructure effects, render the Environmental Impact Assessment incomplete. Consequently, this lack of comprehensive data hampers the ability to fully understand the likely significant effects or residual impacts.

Moreover, there are procedural shortcomings that must be addressed. The failure to

provide a compliant Island Communities Impact Assessment is a breach of the statutory duty under the Islands (Scotland) Act 2018. Additionally, the incomplete Social Impact Assessment represents a material omission that impedes the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience.

The proposal is inconsistent with National Planning Framework 4, which calls for the protection of biodiversity, natural places, and cultural heritage. It does not adequately demonstrate that the health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit due to the lack of tourism impact modelling. The failure to properly assess the cumulative impact of both offshore and onshore elements obscures important effects 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 contain inconsistencies that fail to meet the evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt. This necessitates the application of the precautionary principle, preventing a lawful conclusion regarding the acceptability of impacts.

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

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

### **Additional Comments**

Whilst I am not wholly against the idea of off/onshore wind farms I question the close proximity to shore and size these turbines are going to be. This is what is upsetting to most of my neighbours and colleagues. I am more than aware of the need for sustainable energy, but at any event I have been to, representatives of Northland failed to answer any questions fully.

I also think opportunities have been missed to listen to local opinions and ideas. The Western Isles already has a wealth of experience with renewable projects that could have been drawn on and instead people were brought in who are not fully aware of capabilities and also island culture.

**Yours faithfully,**

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 9945E51A

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

**Dear Sir/Madam**

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, nearly pristine environment, and strong cultural identity. Concerns arise from the scale and proximity of the proposal, which raise significant questions about its compatibility with statutory requirements, national policy, and the principles of sustainable development.

A review of the Environmental Impact Assessment Report and supporting documentation reveals material planning, environmental, cultural, and procedural deficiencies. The application does not provide a sufficient evidential basis for a lawful determination; critical environmental data is absent, and baseline information is both limited and inconsistent. Many aspects of the proposal remain undefined, while the use of a flexible design framework obscures the understanding of likely significant effects. Additionally, the reliance on unspecified mitigation measures renders it impossible to evaluate their effectiveness. Consequently, the documentation fails to offer a full understanding of environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to a lack of robust evidence.

There are also clear and substantial conflicts with policy, as the proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly evident in relation to biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts are directly relevant to the statutory tests required for consent and compromise the competent authority's ability to determine the proposal as acceptable in policy terms.

Given the unprecedented scale of the proposal in this location, with large turbines positioned close to the shoreline, concerns about landscape capacity, visual dominance, and environmental impact are magnified. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be applied.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report lacks the necessary depth and transparency, providing an incomplete overview of the potential environmental

consequences of the proposal. The flexible Project Design Envelope, which does not commit to fixed turbine dimensions, layouts, or configurations, creates considerable uncertainty. This variability hampers the ability to apply a worst-case scenario consistently, thus undermining the assessment's integrity. As a result, the impacts detailed may not accurately represent the development as it will be constructed, making it difficult for both the public and the competent authority to grasp the actual environmental implications.

Moreover, the application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that environmental harm will be addressed later inhibits a thorough evaluation of the proposed measures' effectiveness and obscures the assessment of residual impacts. This postponement of essential information until after consent is granted is procedurally unacceptable and contradicts the fundamental objectives of the Environmental Impact Assessment regime, which mandates that significant effects and their mitigation must be clearly delineated before any determination.

There are also critical evidential shortcomings, including insufficient baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. These gaps generate uncertainty concerning the magnitude and significance of impacts, especially when negligible or non-significant effects are claimed without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that contradicts statutory obligations.

Consequently, the application does not fulfil the evidential criteria stipulated under the Habitats Regulations, which are necessary to dismiss adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, including the stipulations related to biodiversity protection and environmental integrity, as it fails to provide evidence that impacts have been thoroughly assessed or that adequate safeguards are established.

In summary, the reliance on an undefined design envelope, the absence of concrete mitigation strategies, and the significant gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings preclude a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information currently available.

## **ASSESSMENT OF ALTERNATIVES**

The assessment of alternatives presented in this application is fundamentally flawed and fails to adhere to the statutory requirements of the Environmental Impact Assessment regime. Instead of delivering a coherent and reasoned evaluation of realistic alternatives with regard to environmental impacts, the application merely

recounts the project's development history. This lack of structured analysis does not illustrate that less harmful alternatives have been adequately identified, assessed, and chosen over more damaging options.

Moreover, there is a distinct absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has genuinely considered positioning the turbines further offshore, a move that could potentially mitigate visual, ecological, and coastal impacts. Considering the sensitivity of the West Lewis coastline, where proximity to shore is crucial in assessing impact, the lack of such an analysis undermines any assertion that the proposed siting is the least damaging option.

These shortcomings are evident in the evaluation of cable routing and landfall, where there is inadequate evidence that alternative paths have been thoroughly investigated to minimise impacts on sensitive areas. This includes vital sites of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear strategy to avoid such impacts, alongside the lack of comparative analysis, reveals that the principle of mitigation by design has not been properly implemented, leading to an over-reliance on remedial measures after the design phase.

Consequently, the application does not convincingly demonstrate that environmental harm has been reduced through appropriate site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy obstructs the competent authority's ability to ascertain whether there are less harmful and more suitable alternatives available. A robust assessment of alternatives is essential; without it, it cannot be determined that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy jeopardises alignment with National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a significant flaw, which further contributes to the conclusion that the application has not been sufficiently evaluated and is unable to support a lawful determination.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The application fails to adequately meet the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4. There is a significant deficiency in the assessment of marine ecology and protected species, which provides an unreliable understanding of ecological receptors within the sensitive West Lewis coastal environment. The methodologies used are inadequate and do not sufficiently capture crucial aspects of species presence, behaviour, and habitat use, thereby undermining the evidential basis for evaluating potential impacts.

One critical shortcoming is the treatment of otters, a European Protected Species. The

application does not properly recognise or assess their active use of coastal areas for foraging and movement. This oversight neglects their core foraging range and behavioural patterns, resulting in an inadequate assessment of the potential effects from construction disturbance, noise, and increased activity. Such omissions raise significant doubts about the conclusions drawn regarding the absence of significant effects on otters.

In addition, the assessment of basking sharks suffers from methodological flaws, notably the reliance on aerial surveys that introduce substantial detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The failure to incorporate or adequately consider these observations leads to an incomplete baseline and undermines the reliability of the conclusions presented.

The methodological limitations in the assessment result in conclusions of negligible or non-significant effects being based on assumptions rather than robust evidence. Furthermore, the lack of sufficient baseline data hinders any meaningful assessment of cumulative and indirect impacts, including variations over seasons and interactions within the wider ecosystem. This creates uncertainty regarding the true scale of risk posed to marine species and habitats.

When considering these factors, the overall assessment is rendered unreliable due to incomplete baseline data, flawed methodologies, and unsupported conclusions. These deficiencies prevent a thorough evaluation of impacts on marine ecology and protected species, contributing to the conclusion that the application lacks a solid evidential foundation. In light of the uncertainties introduced, consent for the application cannot be lawfully granted.

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The proposed development includes the siting of turbines within key foraging areas and a recognized migratory corridor on the west coast of the Isle of Lewis, which supports internationally important seabird populations. These populations are already experiencing declines, yet the ornithological assessment provided fails to demonstrate adequately that they will not be adversely affected. The assessment lacks sufficient evidence regarding the impacts on seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda. The methodologies employed introduce significant uncertainty, particularly concerning species like Kittiwakes and Fulmars that are in severe decline.

A fundamental contradiction arises within the application itself, as the developer claims there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, a process required when significant harm is anticipated. This inconsistency undermines the reliability of the assessment and suggests that its conclusions are unsupported by the evidence presented. The siting of turbines within a primary flight path poses an additional significant risk, creating a

barrier for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor have not been adequately assessed.

From a regulatory standpoint, the application does not meet the evidential threshold to conclude no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and modelling limitations indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, obstructing any lawful conclusion in favour of consent. Moreover, the identified deficiencies indicate non-compliance with National Planning Framework 4 regarding biodiversity protection and safeguarding natural assets. The proposal's inability to demonstrate that internationally important seabird populations will remain unaffected directly conflicts with national policy.

Overall, the assessment's internal inconsistencies, methodological flaws, and inadequate evidence render it unreliable. These shortcomings prevent a thorough evaluation of the impacts and lead to the conclusion that the application does not satisfy the statutory requirements essential for determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The assessment provided in the application is fundamentally flawed, particularly regarding the cultural heritage and community identity associated with the West Lewis coastline. This area is a living cultural landscape where the environment, language, tradition, and community are deeply interconnected. Instead of recognising these relationships, the application adopts a reductive perspective, treating heritage as a collection of isolated, static assets. Such an approach fails to acknowledge the ongoing social, cultural, and spiritual roles these elements play within the community.

A significant shortcoming is evident in how the assessment treats culturally important sites, specifically the cemeteries located at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are mischaracterised as mere static features. This misrepresentation ignores their continued use and significance, as well as the potential impacts of the proposed development on their surroundings. Consequently, the evaluation of cultural effects remains incomplete, overlooking the cemeteries' essential role in community life.

Additionally, the application neglects to consider intangible cultural heritage elements, which include the Gaelic language, local traditions, and the long-standing relationship between the community and the coastal environment. These aspects are vital to the area's identity but have been entirely omitted from the assessment, representing a major oversight. Without addressing these components, a comprehensive understanding of the cultural impact of the development is unattainable.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity, recognised as having characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement undermines the

assessment's legitimacy and disregards established principles of participation in decisions that affect cultural and environmental interests.

Moreover, a critical procedural failure is the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The lack 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 alone obstructs a lawful determination of the proposal.

From a policy standpoint, these identified deficiencies directly conflict with the National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, alongside a recognition of living cultural practices, signifies a clear deviation from policy obligations.

In conclusion, the combined failures to assess living heritage, intangible cultural values, community rights, and statutory requirements create a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application fails to provide a sufficient basis for determining the true cultural cost of the proposal.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The absence of the full Social Impact Assessment constitutes a significant procedural flaw, preventing the competent authority from conducting a thorough socio-economic and health evaluation. This lack of transparency leads to a material omission within the application, which does not meet the evidential standards required under the Environmental Impact Assessment regime.

Evidence suggests that residents are already facing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These findings, derived from direct engagement with local residents, provide crucial insight into existing adverse effects that must be considered. However, the failure to publish the full assessment hampers proper scrutiny and limits the ability to ascertain the significance of these impacts in the context of decision-making.

Furthermore, the developer's own findings indicate that the proposal is viewed as a threat to community identity and cohesion, citing "cultural loss" as a concern. Unfortunately, these impacts have not been adequately incorporated into the application or afforded the necessary weight. The withholding of the complete Social Impact Assessment obscures the actual human and social costs associated with the development.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 regarding health and wellbeing. Development proposals must foster positive health outcomes and mitigate harm. The available

evidence, which points to existing adverse effects, has not been fully disclosed, thereby preventing a demonstration of compliance with relevant policy.

The deficiency in the assessment of social impacts, health, and wellbeing leads to a materially deficient evaluation that lacks the transparency necessary for lawful consideration. A comprehensive understanding of social, economic, and health impacts is essential for developments of this magnitude, particularly when community character and functionality are at stake. Consequently, the application fails to provide a complete evidential basis for weighing benefits against harm. Taken together, the failure to disclose the full Social Impact Assessment, alongside existing evidence of adverse impacts, renders the assessment incomplete and unreliable, inhibiting a lawful determination and reinforcing the conclusion that the application lacks sufficient information.

### **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The proposal's assessment of visual, seascape, and landscape impacts is severely lacking, failing to capture both the extent of change and the sensitivity of the environment. The West Lewis coastline is characterised by its unspoilt Atlantic horizon, which contributes to its undeveloped nature and profound sense of remoteness. The planned installation of large-scale turbines near the shoreline would result in a continuous industrial presence that would fundamentally change this character, leading to a permanent and irreversible transformation of the landscape.

The application inadequately addresses the magnitude of visual change that would occur. Due to their scale and proximity, the turbines would overpower views from residential areas, historic sites, and popular coastal locations, thus directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. This significant impact has not been properly conveyed, which is particularly concerning given the sensitivity of the landscape in question.

Methodological issues are evident in the selection and presentation of visual viewpoints. There is evidence indicating that these viewpoints may not adequately reflect the most sensitive receptors or potential worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the risk of underestimating the visual impact, thereby compromising the assessment's reliability.

Additionally, the assessment neglects to consider the interconnectedness of the landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are linked to the broader landscape by visual and spatial relationships with the Atlantic horizon. The evaluation incorrectly treats these assets as isolated, failing to recognise their interdependence, which results in an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape threatens to sever these vital connections, altering the context in which heritage assets are experienced and disrupting their relationship to the natural horizon. This signifies not only a visual impact but also a

broader cultural and spatial detriment that has not been thoroughly assessed within the application.

From a policy standpoint, the proposal directly contravenes the National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The anticipated scale of change is incompatible with the mandate to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case scenario assessment further weakens any assertions of policy compliance.

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

In conclusion, the assessment is inadequate in representing the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the position that the proposal is incompatible with the preservation of this landscape.

## **CONSTRUCTION AND POLLUTION RISKS**

The proposal's assessment of construction and pollution risks is fundamentally lacking and fails to provide the necessary detail for evaluating potential environmental effects. Significant seabed preparation and installation works are planned within a high-energy Atlantic environment; however, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans in place. Instead, the application relies on mitigation and contingency measures that would be developed after consent, which limits any meaningful assessment of their adequacy or effectiveness.

This reliance on unspecified future measures raises particular concerns in light of the sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks, including sediment mobilisation and accidental chemical or oil spills, it lacks sufficient detail on prevention, control, or monitoring strategies for these risks.

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

The lack of detailed emergency response procedures exacerbates these issues. By

postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether adequate safeguards are established to respond to pollution incidents. This situation introduces procedural risks and diminishes the ability of the competent authority to assess the effectiveness of environmental protection measures during the decision-making process.

From a regulatory standpoint, the postponement of critical environmental safeguards contradicts the requirements outlined by the Environmental Impact Assessment regime. Assessment of likely significant effects and mitigation measures must occur prior to granting consent, and in the absence of such information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

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

## **FISHERIES AND MARINE LIFE**

The application presents significant deficiencies in its assessment of marine life and fisheries, failing to offer a comprehensive analysis of ecological and socio-economic impacts. Key concerns centre around the waters off the West Lewis coast, which are home to a diverse marine ecosystem and a vital fishing industry. The proposal does not convincingly demonstrate that these habitats and activities can be preserved without substantial disruption.

A major flaw is the presumption that fishing operations can be easily displaced without repercussions. The application does not provide any evidence that alternative fishing areas exist or are accessible, nor that they can handle increased pressure. This gap is critical, as displacing fishing efforts could lead to overfishing in other locations and may also have broader economic implications for the local fishing fleet. The lack of a detailed, evidence-based assessment obscures the understanding of potential impacts on fisheries and livelihoods.

Further risks to marine species arise from the construction activities, notably the high-energy hammer piling, which is expected to generate significant underwater noise. Such disturbance is anticipated to reach considerable distances, potentially impacting local populations of species such as dolphins. The predicted disturbance to a large segment of the local bottlenose dolphin population raises serious concerns, yet the application minimises the importance of these effects without adequate supporting data.

There is a troubling inconsistency within the application where it acknowledges the necessity for licenses to inflict harm on European Protected Species while

simultaneously characterising impacts as negligible. This contradiction calls into question the credibility of the assessment and raises issues regarding adherence to the Habitats Regulations, especially in contexts where anticipated harm necessitates legal authorization.

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

From a policy standpoint, the application does not demonstrate conformity with National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with current marine users or prevent significant negative impacts on marine biodiversity, thereby obstructing any assertion that the proposal constitutes sustainable development.

In summary, the combination of insufficient evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the assessment collectively render it incomplete and unreliable. These shortcomings hinder a proper evaluation of the potential consequences for marine life and fisheries.

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

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

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

By neglecting to assess onshore impacts or delaying this assessment, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment mandates that all aspects of a project must be assessed collectively. The current separation of offshore and onshore elements leads to an incomplete understanding of how combined impacts affect peatlands, habitats, and local communities.

The proposal raises serious concerns regarding the integrity of sensitive habitats, such

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

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

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

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

## **DARK SKIES AND NOCTURNAL WILDLIFE**

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

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

Additionally, there is no investigation into the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collision. The application fails to include any lighting impact assessment or phototaxis study, thus neglecting to evaluate how aviation lighting may affect these species or exacerbate mortality rates.

This gap is exacerbated by the dependence on daytime survey data within the ornithological assessment, which does not account for nocturnal activity or the

associated risks. Species such as Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The absence of site-specific night-time data leaves a critical void in understanding the ecological impacts.

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

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

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

## **TOURISM**

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

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

The implications of not assessing tourism impacts extend beyond the sector itself, affecting local employment, businesses, and the sustainability of the community, particularly within an island context that exhibits limited economic diversification. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities, as mandated under the Islands (Scotland) Act 2018, have not been properly evaluated. From a policy standpoint, the application fails to adhere to the principles outlined in the National Planning Framework 4, especially concerning the

necessity of demonstrating a net benefit and aligning with strategic objectives that prioritise tourism as a growth sector. This inadequacy further hampers the competent authority's ability to thoroughly assess the economic consequences of the proposal.

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

## SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights significant shortcomings in terms of sustainable development, as it fails to meet the requirements outlined by statutory duties and national policy. This application echoes the central issues associated with the earlier Lewis Wind Power proposal, which was rejected in 2008 due to its unacceptable level of industrialisation. Although it is now presented within a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, these improvements do not resolve the fundamental problems.

A reliable evidential basis for this application is lacking. There are critical gaps in baseline data, and the use of an undefined design envelope raises concerns. The reliance on unspecified mitigation measures is particularly troubling, as is the failure to consider essential impact pathways such as nocturnal wildlife, the full scope of onshore infrastructure, and the potential effects on tourism. As a result, the Environmental Impact Assessment is incomplete and does not adequately inform on likely significant effects or residual impacts.

In terms of procedural integrity, there are notable failures present. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018. Furthermore, the omission of a complete Social Impact Assessment is material, obstructing the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies render the application unsuitable for determination.

This proposal is also at odds with National Planning Framework 4. It does not demonstrate sufficient protection for biodiversity, natural environments, and cultural heritage. Additionally, it fails to provide acceptable evidence regarding health and wellbeing impacts, nor does it show a net economic benefit owing to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been assessed properly, thus obscuring potential impacts on peatlands, carbon balance, habitats, and crofting lands.

Uncertainty surrounds the environmental risks associated with this proposal. 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 reached, necessitating the application of the precautionary principle and making it impossible to conclude that impacts are acceptable.

There are concerns regarding substantial and irreversible alterations to a highly sensitive landscape as a result of this proposal. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and the disruption to cultural and visual relationships, along with impacts on tourism, will lead to permanent effects that cannot be adequately mitigated.

In summary, this application is both procedurally and substantively unfit for determination. The multitude of information deficiencies, alongside policy conflicts and unresolved environmental risks, obstructs 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**

Scotland already creates more power than it needs. This proposal is inappropriately industrial in such a sensitive environment and is purely about greed.

**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: 3B48A22F

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

**Dear Sir/Madam**

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. A thorough examination of the Environmental Impact Assessment Report and associated documentation reveals significant deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, relatively unspoiled environment, and strong cultural identity. The design, proximity, and scale of the proposal raise serious questions about its alignment with statutory obligations, national policies, and sustainable development principles.

The application does not present a sufficient evidential basis for a lawful decision. There are gaps in critical environmental data, the baseline information provided is both limited and inconsistent, and many crucial elements of the proposal remain undefined. The flexible design framework employed obscures the understanding of potential significant effects, while the reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the documentation fails to allow for a comprehensive understanding of the environmental, cultural, or community implications, and the assertions of negligible or non-significant effects lack robust evidential support.

There are evident and significant policy discrepancies as well. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment guidelines, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate that national obligations to safeguard biodiversity, climate considerations, and environmental integrity are achievable. Such discrepancies directly impact the statutory tests needed for consent and compromise the ability of the competent authority to determine the proposal's acceptability under policy frameworks.

The unprecedented scale of the proposal, with large turbines located in close proximity to the shoreline, raises substantial concerns about landscape capacity, visual impact, and environmental consequences. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy violations indicate that the application is incomplete and cannot substantiate a lawful determination. In light of these factors, the precautionary principle is imperative.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report presents a number of significant deficiencies that compromise its reliability and transparency regarding the potential environmental effects of the proposed development. One of the most critical issues is the use of a flexible Project Design Envelope, which lacks specificity concerning turbine dimensions, layouts, or configurations. This approach introduces a level of uncertainty that undermines the assessment's integrity, as it prevents a consistent application of worst-case scenarios. Consequently, the impacts outlined may not accurately represent those of the final development, obscuring the true extent of environmental effects from both the public and the competent authority.

Furthermore, the application relies on mitigation measures, monitoring strategies, and management plans that have yet to be established. This reliance implies that environmental harm will be addressed after consent is granted, hindering any meaningful evaluation of the effectiveness of these measures and preventing a thorough assessment of residual impacts. This deferral of essential information to a post-consent phase is procedurally unacceptable and contradicts the core objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation be clearly identified prior to determination.

Additionally, there are major evidential gaps, including inadequate baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. These shortcomings create uncertainty about the scale and significance of the impacts, especially when negligible or non-significant effects are asserted without solid supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts, thereby generating scientific uncertainty that fails to meet statutory obligations.

As a result, the application does not satisfy the evidential criteria outlined in the Habitats Regulations, which require the exclusion of adverse effects beyond reasonable scientific doubt. This raises concerns under the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal does not align with National Planning Framework 4 stipulations regarding biodiversity protection and environmental integrity, as it has not been demonstrated that the impacts have been comprehensively assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, unspecified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These significant deficiencies impede a lawful and robust assessment of environmental effects, placing the competent authority in a position where it cannot make an informed determination based on the information provided.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The assessment of marine ecology and protected species presents significant deficiencies, leading to a lack of reliable understanding of the ecological receptors

present in the West Lewis coastal environment. This area is characterised by high biological activity and sensitivity. However, the methodologies employed in the assessment fail to adequately document species presence, behaviour, and habitat use, resulting in an incomplete dataset that undermines the evaluation of potential impacts.

One major shortcoming is the inadequate consideration of otters, a species protected under European law. The application does not properly identify or assess their active use of coastal areas, crucial for foraging and movement. By neglecting their core foraging range and behaviour, the potential impacts of construction disturbance, noise, and increased human activity are not sufficiently evaluated. This gap significantly undermines any claims about the absence of significant effects on otters.

Moreover, the assessment of basking sharks is similarly flawed. The reliance on aerial surveys introduces a considerable risk of detection bias, particularly under Atlantic conditions, which may lead to an underestimation of their presence in these waters. Established land-based observations indicate that these waters are frequently utilised by basking sharks, yet such relevant data has not been appropriately integrated into the assessment, resulting in an incomplete baseline that further weakens the overall conclusions.

These methodological shortcomings mean that the conclusions suggesting negligible or non-significant effects rely more on assumptions than on robust evidence. The lack of adequate baseline data hampers the ability to conduct meaningful assessments of cumulative and indirect impacts, including variations by season and interactions within the wider ecosystem. Consequently, there is considerable uncertainty regarding the actual risks to marine species and habitats.

From a regulatory standpoint, the application falls short of the Environmental Impact Assessment requirements and the National Planning Framework 4, primarily due to the inadequate identification and assessment of protected species. The degree of uncertainty involved prevents the dismissal of potential adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these issues, granting consent would not be lawful.

In summary, the assessment's unreliable nature stems from incomplete baseline data, flawed methodologies, and conclusions lacking adequate support. These deficiencies hinder a robust evaluation of impacts on marine ecology and protected species, culminating in the conclusion that the application is devoid of a sufficient evidential foundation.

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The assessment of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal contradictions that severely undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are currently in decline. However, the application does not adequately demonstrate that these species will not be adversely affected by

the development. It is located within key foraging areas and migratory pathways, yet the assessment fails to robustly consider the implications of potential displacement, collision risks, and habitat loss.

A critical inconsistency arises in the application itself, where the developer asserts that there will be no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is necessary only if significant harm is anticipated. This contradiction raises serious doubts about the reliability of the assessment, suggesting that the conclusions drawn are not substantiated by the evidence provided. The assessment lacks sufficient evidence to conclude that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. Furthermore, the importance of these feeding grounds is not comprehensively addressed, and the reliance on modelling approaches introduces uncertainty, particularly regarding species facing severe decline like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially in the context of incomplete baseline data and a lack of understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor presents an additional and significant risk, effectively obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not sufficiently evaluate the long-term consequences of ongoing mortality in this corridor or the potential impacts on species with relatively small global populations. From a regulatory standpoint, the application fails to meet the evidential threshold necessary to ascertain no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside data deficiencies and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been reached. This invokes the precautionary principle, which inhibits the ability to lawfully conclude in favour of consent.

Moreover, the deficiencies identified indicate a failure to comply with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal directly at odds with national policy. Collectively, these issues render the assessment unreliable, characterised by internal inconsistencies, methodological shortcomings, and inadequate evidence. These failures hinder a thorough evaluation of impacts, leading to the conclusion that the application does not satisfy the statutory requirements essential for a valid determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The assessment of cultural heritage and community identity is severely lacking. It does not acknowledge the West Lewis coastline as a living cultural landscape. The relationship between environment, language, tradition, and community is crucial but is overlooked. The application simplistically views heritage as isolated, unchanging assets rather than recognising their active social, cultural, and spiritual roles within the community.

A significant flaw in the assessment is the treatment of important sites like the cemeteries at Dalmore, Bragar, and Barvas. These sites are not merely static features; they are active burial grounds and sites for spiritual practices. By failing to consider their ongoing use and the implications of development on their environment, the assessment presents an incomplete view of cultural effects, neglecting their importance in community life.

Additionally, the assessment does not take into account intangible cultural heritage, such as the Gaelic language and local traditions. The long-standing connection between the community and the coastal landscape is vital to the area's identity but is completely ignored. This oversight hampers the ability to fully understand the cultural impact of the proposed development.

There are also serious concerns about community rights and engagement. The Gaelic-speaking community has a unique cultural identity that aligns with 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 disregards accepted participation principles in matters affecting cultural and environmental interests.

Furthermore, a crucial procedural gap exists due to the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal obligations to evaluate social, cultural, and economic effects on the island community. This omission is significant and renders a lawful determination impossible.

From a policy viewpoint, these issues place the proposal at odds with National Planning Framework 4, particularly regarding the safeguarding of historic assets. The neglect of both tangible and intangible heritage and the failure to recognise living cultural practices mark a substantial deviation from policy standards.

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and statutory requirements leads to a considerable evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not establish a sufficient basis for understanding the true cultural costs of the proposal.

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The assessment concerning seascape, landscape, and visual impacts is significantly inadequate, failing to accurately reflect both the extent of change and the sensitivity of the environment in question. The West Lewis coastline is characterised by an unspoilt Atlantic horizon, a lack of development, and a pronounced sense of remoteness. The proposed large-scale turbines, located close to the shoreline, would introduce a continuous industrial presence that would fundamentally change this character, leading to a permanent and irreversible alteration of the landscape.

Moreover, the application does not sufficiently convey the magnitude of visual change. The turbines' scale and proximity would dominate views from residential locations, historical sites, and popular coastal areas. This would have a direct effect on visual amenity, diminishing the core qualities of naturalness and remoteness. The assessment fails to adequately capture the significance of this impact, particularly given the sensitive nature of the landscape involved.

Methodological issues also arise concerning the choice and depiction of visual viewpoints. Evidence indicates that these viewpoints might not accurately represent the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and landscapes of high value. This oversight raises concerns that the magnitude of visual impact has been understated, consequently compromising the assessment's reliability.

Additionally, there is a failure to recognise the interconnectedness of landscape, seascape, and cultural heritage. Notable 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 considers these sites in isolation rather than acknowledging their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these vital relationships, changing the context in which heritage assets are perceived and breaking their connection to the natural horizon. This represents not only a visual detriment but also a wider cultural and spatial damage that has not been thoroughly evaluated in the application.

From a policy standpoint, the proposal stands in direct conflict with the National Planning Framework 4, particularly regarding the safeguarding of natural environments and historical assets. The anticipated scale of change is incompatible with the necessity to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a rigorous worst-case assessment further diminishes any assertions of policy adherence.

It is evident that the identified impacts cannot be mitigated effectively. Due to the size, height, and proximity of the turbines, their presence would be overwhelming and inescapable. Thus, the resulting change is fundamental and permanent, rendering any potential for mitigation to an acceptable level unlikely.

Collectively, the assessment does not accurately depict the scale of the impact, the environment's sensitivity, or the interconnected nature of the landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the safeguarding of this landscape.

## **CONSTRUCTION AND POLLUTION RISKS**

The assessment of the potential environmental effects related to construction and pollution is inadequate, lacking the detail necessary for a comprehensive evaluation.

The proposal entails extensive seabed preparation and installation works in a high-energy Atlantic environment, yet it fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on unspecified mitigation and contingency measures to be created after consent, which hinders any meaningful assessment of their sufficiency or effectiveness.

Given the sensitivity of the receiving environment, this dependence on undefined future measures raises significant concerns. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application recognises risks such as sediment mobilisation and accidental chemical or oil spills, it does not adequately outline how these risks will be prevented, controlled, or monitored.

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

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

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

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

## **FISHERIES AND MARINE LIFE**

The proposed development presents several critical issues regarding its assessment of marine life and fisheries, which are insufficient and lack a comprehensive evaluation of both ecological and socio-economic impacts. The local fishing industry and diverse marine ecosystem off the West Lewis coast are vital, yet the application does not adequately demonstrate how these essential uses and habitats will be protected or

maintained without significant disruption.

A notable concern is the premise that fishing activities can be displaced without repercussions. The application fails to provide any evidence regarding the availability, accessibility, or capacity of alternative fishing grounds to accommodate additional pressures. This omission is particularly significant, as it poses the risk of overfishing in other areas and could lead to broader economic consequences for the local fishing fleet. Without a clear, evidence-based assessment, it is impossible to fully understand the impacts on fisheries and local livelihoods.

The proposal also raises considerable risks for marine species, especially due to the underwater noise generated during construction. The use of high-energy hammer piling over prolonged periods is expected to cause disturbances that could reach large distances, affecting populations such as dolphins. There are serious concerns surrounding the anticipated disturbance to a substantial portion of the local bottlenose dolphin population, yet the application downplays these effects, lacking adequate supporting evidence.

There is a notable inconsistency within the application regarding the recognition of the need for licences to permit harm to European Protected Species while simultaneously asserting that the impacts are negligible. This contradiction undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially in situations where harm is anticipated to a degree that necessitates legal authorisation.

The assessment does not adequately consider cumulative impacts stemming from various pressures such as habitat disturbance, noise, and the displacement of fishing activity. The absence of a comprehensive evaluation of these combined effects means that the overall impact on marine ecosystems and socio-economic conditions remains undetermined.

From a policy standpoint, the application falls short in demonstrating compliance with the National Planning Framework 4 and the National Marine Plan. It does not convincingly show that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which precludes any conclusion that the proposal represents sustainable development.

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

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The proposed project encompasses both offshore turbines and onshore works; however, the assessment of the onshore infrastructure is incomplete, failing to account for the full range of impacts associated with this single integrated initiative. The

offshore and onshore components are inherently connected, yet they are evaluated separately, which leads to a fragmented understanding of the environmental and socio-economic ramifications.

Among the onshore elements are the installation of 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, particularly within Barvas Moor, which is recognized as a significant carbon store and an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, thereby inhibiting a comprehensive understanding of the project's overall environmental footprint.

The approach of excluding or delaying the evaluation of onshore impacts obstructs a proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project be considered collectively, yet the disaggregation of offshore and onshore components obscures the combined impacts on peatlands, habitats, and local communities.

Moreover, there are considerable risks to sensitive habitats, including machair systems and peatland environments, which are protected under policy guidelines. The application fails to demonstrate that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been established. This presents a clear evidential gap regarding biodiversity protection.

The proposal also raises issues concerning carbon balance, as the disturbance of peatland can release stored carbon, potentially resulting in a carbon debt that contradicts the goals of renewable energy development. The application does not adequately address this concern or prove that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land poses possible conflicts with existing land use and legal rights. The application provides no evidence that the required consents or processes have been initiated, thus raising concerns about the feasibility and legal validity of implementation.

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

In summary, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts contribute to the conclusion that this section of the application is incomplete and unreliable, which obstructs a lawful determination.

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The lack of assessment regarding nocturnal wildlife and dark skies constitutes a serious gap in the Environmental Impact Assessment. The proposal is situated along the West Lewis coastline, an area known for its exceptionally dark skies that are crucial for environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting will create a continuous “wall of light” effect across the western horizon, fundamentally changing the night-time environment.

Significantly, the application does not evaluate the implications of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly noteworthy given that dark skies are vital to the area's identity and to emerging sectors such as astro-tourism. As a result, the failure to consider these impacts leads to a clear shortfall in the overall landscape and environmental evaluation.

Moreover, there is no examination of how the lighting may affect nocturnal wildlife, including sensitive species such as the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel. These species are particularly vulnerable to artificial lighting due to their phototaxis, which can result in disorientation and an increased risk of collision. The application lacks any lighting impact assessment or phototaxis study, meaning it does not assess the potential effects of aviation lighting on these species or their mortality rates.

This gap is further exacerbated by the use of daytime survey data in the ornithological assessment, which fails to account for nocturnal activities and related risks. Species such as Kittiwakes, which may forage or migrate at night, are similarly at risk of disorientation from artificial light, yet this has not been evaluated. The absence of night-time specific data leads to a critical shortfall in understanding ecological consequences.

Without an assessment of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites could be adversely affected. The necessary evidential standard to dismiss adverse effects beyond reasonable scientific doubt cannot be achieved, thereby invoking the precautionary principle and inhibiting a lawful determination.

From a policy standpoint, the omissions in the assessment contravene the National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. This also detracts from the comprehensive evaluation of landscape and seascape impacts, since the character of night-time environments is an essential aspect of the overall setting.

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

## **TOURISM**

The assessment of tourism impacts within the application is notably inadequate and neglects to address 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 landscapes, dark skies, and a profound sense of remoteness. The application itself acknowledges that 86% of visitors are attracted by the scenery, yet it lacks a quantified analysis of how the introduction of large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution to the region.

The significance of tourism in the local economy is underscored by its substantial growth, with revenues increasing from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs, accounting for as much as 16% of the island's economy. Despite this impressive development, the application fails to simulate how the industrialisation of the seascape and the degradation of environmental quality could adversely affect Tourism Gross Value Added and the broader economic resilience. Without this crucial analysis, it remains unclear whether the proposed development would yield a net economic benefit or harm an already established and expanding sector.

Moreover, the assessment neglects the essential role that environmental quality plays in bolstering tourism, including the critical importance of unspoiled landscapes and dark skies in enriching visitor experiences and tapping into emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, leaving a significant gap in understanding the impacts on a recognized and growing segment of the local economy.

In an island community characterised by limited economic diversification, the disregard for tourism impacts carries broader repercussions for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been thoroughly evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to illustrate compliance with the National Planning Framework 4, particularly concerning economic impact and the necessity to demonstrate net benefits. It also contradicts strategic objectives that prioritise tourism as a key growth sector and lacks sufficient evidence for the competent authority to properly assess the economic ramifications of the proposal.

Overall, the failure to quantify tourism impacts, evaluate the environmental factors driving visitor behaviour, and account for the island's economic dependency culminates in a significant evidential gap. This deficiency inhibits a comprehensive appraisal of the economic effects, leading to the conclusion that the application is incomplete.

## **SUMMARY**

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the essential criteria for sustainable development as outlined by statutory duties, national policy,

and evidential standards. This application revisits the fundamental issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, 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, the proposal does not adequately address these critical concerns.

Significant gaps in baseline data and the continued use of an undefined design envelope undermine the reliability of the application. Additionally, it relies on unspecified mitigation measures and omits essential impact pathways such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, obstructing a comprehensive understanding of potential significant effects or residual impacts.

There are notable procedural shortcomings as well. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018, while the failure to disclose the complete Social Impact Assessment is a material omission. These deficiencies hinder the competent authority from accurately assessing the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal contradicts National Planning Framework 4, failing to illustrate the protection of biodiversity, natural places, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to insufficient tourism impact modelling. Furthermore, the cumulative impact of both offshore and onshore elements has not been adequately evaluated, obscuring implications for 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 inconsistent. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus engaging the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unsuitable for determination. The multitude of information deficiencies, combined with policy inconsistencies and unresolved environmental risks, obstructs a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuse consent on these grounds or invoke the necessary regulatory provisions to mandate the

submission of the missing information.

In light of these issues, a formal request is made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

### **Additional Comments**

In addition to my concerns above, as a regular visitor to the west coast of Scotland I feel the need to raise this objection in concern for the huge environmental and visual impact such a development will have. The effects on the marine and bird life is a complete unknown and I am aware of concerns for various species adversely affected by such industrialisation of our coastal waters.

The impact on the local communities in terms of the development stages on Lewis, the impact on local infrastructure, the roads and the huge adverse impact on tourism.

People want to come to Scotland for its wilderness, its wildlife, its stunning mountain landscape and seascapes, not to look at its coastal waters ruined by industrial scale developments such as these.

There is no clear strategy for energy development and it's associated infrastructure in Scotland and until there is councils should be declining such catastrophic proposals until such times as there is a clear and much more considered plan.

**Yours faithfully,**

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: F5FA0238

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

**Dear Sir/Madam**

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report and its accompanying documentation, revealing significant deficiencies in planning, environmental impact, cultural considerations, and procedural aspects. The development site is situated off the west coast of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, nearly untouched environment, and robust cultural heritage. Concerns about the scale, proximity, and design of the proposed wind farm raise serious questions regarding its alignment with statutory obligations, national policies, and the principles of sustainable development.

The submission lacks a comprehensive evidential basis necessary for a lawful decision. There is a notable absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Many important elements of the proposal remain undefined. The flexible design framework employed makes it difficult to ascertain potential significant effects, and the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts involved, and assertions of negligible or non-significant effects lack robust supporting evidence.

There are evident and substantial conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, especially concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. It has not demonstrated adherence to national requirements aimed at protecting biodiversity, climate considerations, and environmental integrity. These conflicts relate directly to the statutory tests necessary for consent and weaken the capacity of the competent authority to determine the development's acceptability from a policy standpoint.

The unprecedented scale of the proposal in this particular location poses additional challenges, with large turbines positioned alarmingly close to the shoreline, raising significant issues regarding landscape capacity, visual dominance, and overall environmental impact. Collectively, the insufficient information provided, reliance on undefined mitigation strategies, evidential shortcomings, and clear non-compliance with policy underscore that the application is incomplete and fails to support a lawful determination. In light of these issues, the precautionary principle is paramount.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

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

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

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

Consequently, the application does not meet the evidential threshold established under the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes stipulations regarding biodiversity protection and environmental integrity, as it remains unproven that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

## **ASSESSMENT OF ALTERNATIVES**

The proposed development suffers from a materially inadequate assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact

Assessment regime. Instead of delivering a structured and reasoned comparison of realistic alternatives based on environmental effects, the application offers a narrative of the project's evolution. This method does not demonstrate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

Moreover, there is a distinct lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. The application notably does not indicate that the developer has genuinely explored the possibility of placing turbines further offshore, where the potential for reduced visual, ecological, and coastal impacts would exist. Given the sensitivity of the West Lewis coastline and the critical significance of proximity to shore in determining impact, the absence of such analysis precludes any assertion that the proposed siting is the least damaging option available.

The inadequacies further extend to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been properly examined to avoid or minimise impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis point to a failure to apply mitigation by design, resulting in a reliance on post-design mitigation measures instead.

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

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

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The proposed development presents significant concerns regarding its impact on marine ecology and protected species. The assessment conducted does not provide a complete or reliable understanding of the ecological receptors within the West Lewis coastal environment, which is a highly sensitive and biologically active marine system. Incomplete baseline data and inadequate methodologies have failed to capture vital information regarding species presence, behaviour, and habitat use. Consequently, this assessment lacks a sound evidential basis for evaluating potential impacts.

Particularly concerning is the omission of otters, a European Protected Species. The application does not adequately recognise or assess their active use of coastal areas

for foraging and movement. This oversight in considering their core foraging range and behavioural patterns means that the potential effects of construction disturbance, noise, and increased activity remain insufficiently assessed. Such deficiencies undermine any conclusions regarding the absence of significant effects on the species.

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

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

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

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

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The ornithological assessment presents significant shortcomings that fundamentally undermine its credibility. Key foraging areas and migratory pathways critical to the internationally important seabird populations along the west coast of the Isle of Lewis are not adequately addressed. Despite the development being located within these vital zones, the assessment fails to convincingly demonstrate, to the necessary evidential standard, that these species will not be adversely affected. The implications of potential displacement, collision risk, and habitat loss are insufficiently evaluated.

Moreover, a notable contradiction exists in the application, as the developer asserts there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is typically required only when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are not underpinned by solid evidence.

The assessment does not adequately establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is inadequately acknowledged, and the reliance on modelling methods creates further uncertainty, particularly for species already in severe decline, like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially in light of incomplete baseline data and insufficient understanding of species' behavioural responses.

The siting of turbines within a recognised migratory corridor poses additional risks, effectively creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor, along with potential impacts on species with relatively small global populations, are not properly assessed.

From a regulatory standpoint, the application fails to fulfil the evidential threshold necessary to assert that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, precluding a lawful conclusion that would support consent.

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

In conclusion, the assessment is rendered unreliable by its internal inconsistencies, methodological flaws, and insufficient evidence. These issues inhibit a thorough evaluation of the impacts and culminate in the assertion that the application does not satisfy the statutory requirements necessary for determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The evaluation of community identity and cultural heritage is fundamentally flawed, as it overlooks the West Lewis coastline as a dynamic cultural landscape where tradition, language, community, and environment are deeply intertwined. The assessment treats heritage as a collection of isolated and static features, neglecting their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming is the assessment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are places of active burial and spiritual practice, yet the assessment fails to acknowledge their continued relevance, instead categorising them as mere static assets. This mischaracterisation leads to an incomplete analysis of cultural impacts and disregards their integral role in community life.

Moreover, the evaluation neglects intangible cultural heritage, including the Gaelic language and local traditions, as well as the enduring relationship between the community and the coastal environment. These elements are vital to the area's identity but have been completely overlooked in the assessment, marking a significant gap in understanding the cultural impact of the development.

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

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

From a policy standpoint, these shortcomings place the proposal in direct opposition to the National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The failure to account for both tangible and intangible heritage, alongside the disregard for living cultural practices, signifies a clear deviation from established policy requirements.

Ultimately, the neglect of living heritage, intangible cultural values, community rights, and necessary statutory assessments results in a substantial evidential void. The cultural impacts of the proposed development have not been adequately evaluated, leaving the application lacking a solid foundation for understanding the true cultural cost involved.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The developer's failure to publish the full Social Impact Assessment is a critical concern that undermines the evaluation of social impacts, health, and wellbeing related to the proposed development. While a Social Impact Assessment was commissioned and included focus groups with local residents, the lack of transparency surrounding this report creates a significant evidential gap. This omission hampers both public understanding and the competent authority's ability to assess the full extent of social risks identified in the developer's own research.

Evidence indicates that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts have been derived from direct engagement rather than speculation, yet the withholding of the complete assessment prevents thorough scrutiny of these findings and restricts the capacity to evaluate their significance in the decision-making process.

Furthermore, there are indications that the proposal threatens community identity and cohesion, with “cultural loss” highlighted in the developer's findings. Despite this recognition, such impacts have not been adequately incorporated into the main application or given appropriate consideration. The lack of access to the full Social Impact Assessment obscures the real human and social costs associated with the development.

This deficiency of transparency also compromises the Environmental Impact Assessment process. It is crucial to have a complete understanding of social, economic, and health implications for developments of this magnitude, particularly when community character is at stake. Without the full dataset, the application lacks a comprehensive evidential basis necessary for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and avoid harm; however, existing adverse effects are evident and have not been fully revealed. Without the full assessment, compliance with this policy cannot be established.

The procedural consequences of this situation are considerable. The competent authority cannot conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission within the application and a failure to fulfil the evidential requirements set by the Environmental Impact Assessment framework.

Overall, the combination of the non-disclosure of the full Social Impact Assessment and the existing evidence of adverse impacts renders the assessment incomplete and unreliable. This circumstance obstructs a lawful determination and highlights that the application lacks sufficient information to proceed.

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The proposal poses significant concerns regarding the interconnected relationship between seascape, landscape, and cultural heritage. Key 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. The assessment treats these heritage assets as isolated, neglecting their interdependence and failing to evaluate the impacts on their setting and cultural significance adequately. The industrialisation of the seascape threatens to sever these connections, altering the context in which these heritage assets are experienced and disrupting their relationship with the natural horizon. This signifies a broader cultural and spatial harm that has not been sufficiently addressed in the application.

The visual impacts identified are particularly concerning. The application does not accurately represent the magnitude of visual change resulting from the introduction of large-scale turbines. Their scale and proximity would dominate views from residential

areas, historic sites, and popular coastal locations, leading to a direct loss of visual amenity. The assessment inadequately conveys the significance of this impact within such a sensitive landscape, undermining the appreciation of naturalness and remoteness which defines the West Lewis coastline, characterised by its open Atlantic horizon and undeveloped nature.

Methodological issues also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not comprehensively reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. Such shortcomings introduce a risk that the visual impact has been understated, casting doubt on the reliability of the assessment's findings.

From a policy standpoint, the proposal is incompatible with National Planning Framework 4 concerning the protection of natural places and historic assets. The scale of proposed changes conflicts with the necessary safeguarding of landscape character, visual amenity, and the setting of culturally significant sites. Moreover, the absence of a robust worst-case assessment further weakens any assertions of compliance with relevant policies.

The overall assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is not aligned with the protection of this landscape. It is evident that the impacts identified cannot be effectively mitigated; the scale, height, and proximity of the turbines would ensure their presence is dominant and unavoidable, leading to a permanent transformation rather than one that could be reduced to an acceptable level through mitigation efforts.

## **CONSTRUCTION AND POLLUTION RISKS**

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

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

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

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

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

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

## **FISHERIES AND MARINE LIFE**

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry, yet the current application fails to adequately assess the ecological and socio-economic impacts associated with the proposed development. A significant concern is the assumption that fishing activities can be relocated without negative consequences. The lack of evidence supporting the availability of alternative fishing grounds that are both accessible and capable of handling increased pressure is troubling. This omission poses a risk of overfishing in other areas and may lead to broader economic repercussions for the local fishing fleet. Without a thorough and evidence-based analysis, the implications for fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses substantial threats to marine species due to underwater noise during construction activities. The extended use of high-energy hammer piling is expected to create disturbances across considerable distances, impacting species such as dolphins. The anticipated disruption to a notable portion of the local bottlenose dolphin population raises critical issues, yet the application minimises these effects without providing adequate supporting evidence.

The application also contains inconsistencies, particularly regarding the need for

licences to authorise harm to European Protected Species, while simultaneously declaring such impacts as negligible. This contradiction raises doubts about the credibility of the assessment and suggests potential non-compliance with the Habitats Regulations, especially when harm is expected to a level that necessitates legal approval.

Moreover, the evaluation neglects to account for cumulative impacts resulting from various pressures, including habitat disruption, noise, and fishing displacement. The absence of a detailed examination of these interconnected effects hinders the ability to assess the overall consequences on marine ecosystems and socio-economic conditions.

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

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment render it incomplete and untrustworthy. These shortcomings preclude a comprehensive evaluation of the potential impacts on marine life and fisheries.

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The assessment concerning onshore infrastructure is fundamentally lacking, failing to account for the comprehensive impacts stemming from this single integrated project. The connection between the offshore turbines and the onshore works is crucial; however, the evaluation treats these elements as distinct entities. This separation leads to a disjointed analysis that obscures the true magnitude of environmental and socio-economic repercussions.

Significant onshore works are involved, such as cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the development of access infrastructure through sensitive landscapes. Notably, excavation activities across regions of deep peat, especially within Barvas Moor—which serves as an important carbon store and ecologically sensitive habitat—are part of this project. The current application lacks a thorough assessment of these impacts, hindering a full comprehension of the environmental footprint associated with the project.

Moreover, the application's choice to exclude or postpone the assessment of onshore impacts impedes an accurate evaluation of cumulative effects. The Environmental Impact Assessment mandates that all elements of a project are considered in unison; however, the disjointed approach to offshore and onshore components means the combined effects on peatlands, habitats, and local communities remain inadequately understood.

Risks to sensitive habitats, including machair systems and peatland environments, which are afforded policy protection, are also significant. The application fails to demonstrate a comprehensive assessment of the impacts on these habitats or to indicate that appropriate avoidance measures have been implemented. This gap in evidence regarding biodiversity protection is concerning.

Additionally, the proposal presents issues relating to carbon balance. The disturbance of peatland has the potential to release stored carbon, leading to a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this critical matter or provide evidence that the overall carbon balance remains favourable.

The routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal entitlements. There is insufficient evidence in the application to confirm that the required consents or procedures have been initiated, which raises doubts about the deliverability and lawful execution of the project.

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

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

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The West Lewis coastline is known for its exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism. The proposed development includes permanent red aviation lighting that would create a "wall of light" effect across the western horizon. This lighting would disturb the night-time environment, significantly impacting visual amenity, landscape character, and the experiences of both residents and visitors. The absence of an assessment regarding these impacts is concerning, particularly given the growing importance of dark skies to local identity and sectors like astro-tourism.

Furthermore, there is no evaluation of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application fails to provide any lighting impact assessment or phototaxis study to gauge how aviation lighting might affect these species or their mortality rates.

The issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activities or the associated risks.

For instance, Kittiwakes that forage or migrate at night are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The lack of site-specific data regarding night-time activity creates a significant gap in understanding the ecological impacts.

Without a proper assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be negatively affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt is not met, which engages the precautionary principle and obstructs lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4, which emphasises the importance of protecting natural places and environmental quality. Moreover, it undermines the overall evaluation of landscape and seascape impacts, as the character of the night-time environment is essential to the ecological context.

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

## **TOURISM**

The application inadequately addresses the economic and social impacts of tourism, which is a vital component of the Isle of Lewis economy. The local tourism sector is heavily reliant on the area's wild coastline, pristine landscapes, dark skies, and sense of remoteness. While it is noted that 86% of visitors are attracted by the scenery, the application lacks a quantitative assessment of how the introduction of large-scale offshore infrastructure might influence visitor numbers, behaviours, and the overall economic contribution of tourism.

Tourism has experienced considerable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and making up to 16% of the island's economy. However, the failure to model the potential impact of seascape industrialisation and the loss of environmental quality on Tourism Gross Value Added and overall economic resilience is concerning. Without this analysis, it remains unclear if the proposed development would yield a net economic benefit or hinder an established and expanding sector.

Furthermore, the assessment overlooks the significance of environmental quality for tourism, particularly the role of unspoiled landscapes and dark skies in shaping visitor experiences and fostering emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a substantial gap in understanding the impacts on an already recognised and developing sector of the local economy.

In an island community characterised by limited economic diversification, the inadequate evaluation of tourism impacts raises serious concerns regarding employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been examined as required by the Islands (Scotland) Act 2018.

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

Overall, the combination of insufficient quantification of tourism impacts, neglect of the environmental factors influencing visitor behaviour, and disregard for the island's economic dependency leads to a critical evidential shortcoming. This deficiency hampers a thorough evaluation of the economic effects and reinforces the conclusion that the application is incomplete.

## SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the standards for sustainable development as required by statutory duties, national policy, and evidential standards. It revisits the fundamental issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the degree of industrialisation was deemed unacceptable. This current application is presented under a policy framework that places a stronger emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps exist in the evidential basis for this application. There is incomplete baseline data, an undefined design envelope, unspecified reliance on mitigation measures, and key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects are omitted. The Environmental Impact Assessment is therefore inadequate, lacking the information necessary for a comprehensive understanding of significant effects or residual impacts.

Additionally, there are clear procedural issues. The failure to conduct a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, and the lack of a full Social Impact Assessment is a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal is also at odds with National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage, fails to show that health and wellbeing impacts are acceptable, and cannot provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been properly

evaluated, masking their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain unclear and may be significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been reached, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively inadequate for determination. The scale of information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. Therefore, the competent authority must either refuse consent for the application or use the appropriate regulatory provisions to request the submission of the missing information.

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

### **Additional Comments**

This proposed off shore windfarm is in the wrong place.  
The impact on marine life human life and the environment as well as tourism will be non reversible and catastrophic.

This coastline is one of the most beautiful in Scotland and filled with our marine life.  
To place an off shore windfarm off the west coast of The Isle of Lewis would be criminal.

**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: DA53711B

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

**Dear Sir/Madam**

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

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

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

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

## ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presented is inadequate and fails to deliver a comprehensive, transparent, or dependable evaluation of the likely environmental consequences of the proposed development. The approach utilising a flexible Project Design Envelope, devoid of specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This situation obstructs the consistent application of a worst-case scenario analysis and compromises the integrity of the assessment. Consequently, the impacts detailed may not accurately represent the development that may ultimately be constructed, hindering both public understanding and the competent authority's ability to grasp the true magnitude of the environmental effects.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. The request for consent is predicated on the assumption that environmental harm will be resolved at a later date, which precludes any meaningful assessment of the effectiveness of these measures or evaluation of residual impacts. This deferral of essential information to stages following consent is procedurally unacceptable, undermining the objective of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies must be clearly established prior to determination.

Significant evidential deficiencies exist within the assessment, including gaps in baseline data, methodological limitations, and the reliance on assumptions rather than site-specific evidence. This results in uncertainty surrounding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are posited without robust supporting evidence. The insufficiency of information obstructs a clear comprehension of cumulative and worst-case impacts, fostering scientific uncertainty that contravenes statutory obligations.

As a result of these issues, the application does not satisfy the evidential standard set forth under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, including mandates related to biodiversity protection and environmental integrity, as it cannot establish that impacts have been thoroughly assessed or that appropriate safeguards are in place.

Collectively, the reliance on an ill-defined design envelope, the lack of specified mitigation measures, and the existence of gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make a determination based on the information supplied.

## ASSESSMENT OF ALTERNATIVES

The assessment of alternatives within the application is materially inadequate and fails to satisfy the statutory requirements of the Environmental Impact Assessment regime. The application does not provide a structured or reasoned comparison of realistic alternatives based on environmental effects. Instead, it offers a narrative account of project evolution that does not adequately demonstrate that less harmful options have been properly identified, assessed, and preferred over more damaging solutions.

There is a lack of transparent or evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has seriously considered the option of placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be mitigated. Considering the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in determining impact, the failure to conduct such analysis precludes any conclusion that the proposed siting is the least damaging option available.

The deficiencies also extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis indicate that mitigation by design has not been employed, relying instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This signifies a failure to adhere to the established mitigation hierarchy, thereby obstructing the competent authority's ability to ascertain whether less harmful and more suitable alternatives exist. In the absence of a robust alternatives assessment, it cannot be concluded that the proposal aligns with principles of sustainability or is compliant with policy.

From a policy perspective, this shortcoming undermines adherence to National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The failure to present a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed and fails to offer a thorough and dependable understanding of the ecological receptors present. This region is recognised as a highly sensitive and biologically vibrant marine system; however, the baseline data available is incomplete. The methodologies employed do not adequately capture the presence, behaviour, and habitat usage of various species, leading to an assessment that lacks a solid evidential basis for evaluating potential impacts.

A significant shortcoming within the application pertains to otters, classified as a European Protected Species. There is insufficient recognition and evaluation of their active use of coastal areas for foraging and movement. The oversight of their core foraging range and behavioural patterns results in a failure to appropriately assess the potential effects of construction disturbance, noise, and increased activity, thereby undermining any conclusions regarding the absence of significant impacts on this species.

Moreover, the assessment of basking sharks is similarly deficient, as it relies heavily on aerial surveys, which introduce considerable detection bias, especially under Atlantic conditions. This methodology is prone to underestimating the presence of these sharks, particularly when compared to established land-based observations that demonstrate frequent usage of these waters. The lack of incorporation or proper consideration of such relevant data results in an incomplete baseline and diminishes the credibility of the conclusions drawn.

Due to these methodological inadequacies, the conclusions regarding negligible or non-significant effects are grounded in assumptions rather than solid evidence. The deficiency of adequate baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. Consequently, this engenders uncertainty concerning the actual risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the stipulations of the Environmental Impact Assessment regime and the National Planning Framework 4, as it has failed to properly identify or assess the protected species involved. The resulting uncertainty precludes the dismissal of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these conditions, the granting of consent cannot be lawfully justified.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsubstantiated conclusions leads to an unreliable assessment. These shortcomings inhibit a rigorous evaluation of the impacts on marine ecology and protected species, ultimately contributing to the overarching determination that the application does not rest on a sufficient evidential foundation.

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The application presents significant methodological weaknesses and internal inconsistencies that undermine its conclusions regarding the ornithological assessment. It fails to demonstrate, to the necessary evidential standard, that internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, will remain unaffected. This development is situated within crucial foraging areas and migratory pathways; however, the assessment inadequately evaluates the potential implications of displacement, collision risk, and habitat loss.

There exists a fundamental contradiction within the application, as it asserts that there will be no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the assessment and casts doubt on the validity of the conclusions drawn from the available evidence.

Furthermore, the assessment does not sufficiently account for the seabird species associated with protected sites such as the Lewis Peatlands and St Kilda. The critical nature of these feeding grounds is not fully recognised, and the dependence on modelling approaches introduces uncertainty, particularly concerning species facing severe decline, including Kittiwakes and Fulmars. Methodologies employed are likely to underestimate potential mortality, particularly in light of incomplete baseline data and inadequate understanding of species' behavioural responses.

The placement of turbines within a recognised migratory corridor presents an additional significant risk, effectively obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of sustained mortality within this corridor or its potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not 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, alongside data deficiencies and modelling constraints, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This situation engages the precautionary principle, precluding a lawful conclusion in support of consent.

Moreover, the identified deficiencies signify non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally significant seabird populations will not be adversely impacted directly conflicts with national policy.

Collectively, the assessment lacks reliability due to its internal contradictions, methodological flaws, and inadequate evidence. These deficiencies obstruct a thorough evaluation of impacts and substantiate the overall conclusion that the application does not meet the statutory requirements essential for determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The assessment fails to recognise the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply interwoven. It adopts an overly simplistic view by treating cultural heritage merely as isolated and unchanging assets, rather than as dynamic elements with ongoing social, cultural, and spiritual significance within the community.

Cemeteries at Dalmore, Bragar, and Barvas, which serve as active sites for burial and spiritual practices, are mischaracterised as static features. This oversight neglects their continuous use and meaning, as well as the potential effects of development on their surroundings. As a result, the evaluation of cultural impacts remains fundamentally incomplete and overlooks the vital role these sites play in community life.

Moreover, the absence of consideration for intangible cultural heritage, such as the Gaelic language, local traditions, and the longstanding connection between the community and the coastal environment, is a critical shortcoming. These elements are essential to the identity of the area but have been completely disregarded in the assessment, leading to a failure in understanding the true cultural implications of the development.

There are serious concerns regarding community rights and engagement. The Gaelic-speaking population, possessing a distinct cultural identity akin to that of an Indigenous People, has not been consulted through a Free, Prior and Informed Consent process. This lack of meaningful engagement raises questions about the legitimacy of the assessment and contradicts established principles that promote participation in decisions impacting cultural and environmental interests.

Additionally, there is a significant procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. This omission means the competent authority cannot legally assess the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

These oversights also place the proposal at odds with the National Planning Framework 4, specifically concerning the protection of historic assets and spaces. The neglect of both tangible and intangible heritage and the failure to acknowledge living cultural practices clearly deviates from policy obligations.

Ultimately, the inability to adequately assess living heritage, intangible cultural value, community rights, and statutory requirements results in a significant evidential gap. The cultural impacts of the proposed development remain improperly evaluated, and the application lacks a sound basis for determining the genuine cultural costs involved.

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The assessment presented regarding seascape, landscape, and visual impacts falls significantly short of accurately capturing the extent of change and the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its unspoiled Atlantic horizon, undeveloped nature, and profound sense of remoteness. The proposed large-scale turbines positioned near the shoreline would establish an overwhelming industrial presence, fundamentally changing this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the application does not sufficiently represent the extent of the visual

transformation. Given their size and proximity, the turbines would dominate views from residential areas, historic locations, and popular coastal spots. This would detrimentally affect visual amenity and compromise the defining characteristics of naturalness and remoteness. The assessment does not adequately convey the significance of this impact within the context of such a sensitive landscape.

Concerns also arise from the methodology used in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not fully reflect the most sensitive receptors or the most adverse scenarios, particularly concerning critical cultural heritage sites and valuable landscapes. This oversight raises the possibility that the visual impact has been underestimated, thereby undermining the assessment's reliability.

Additionally, there is a notable failure to evaluate the interconnectedness between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones, alongside other Scheduled Monuments, form part of a broader landscape intricately linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as independent entities without acknowledging their interdependence, leading to an incomplete analysis of the impacts on their settings and cultural significance.

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 represents not merely a visual concern but a wider cultural and spatial detriment that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal directly contradicts the National Planning Framework 4 regarding the protection of natural environments and historic assets. The magnitude of change is not compatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case scenario analysis further weakens any assertion of policy compliance.

Furthermore, it is evident that the identified impacts cannot be effectively mitigated. Due to the turbines' scale, height, and proximity, their presence would be unavoidable and dominant. Consequently, the resulting transformation is 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 impact's scale, the environment's sensitivity, and the interrelated nature of the landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is fundamentally incompatible with the protection of this landscape.

## **CONSTRUCTION AND POLLUTION RISKS**

The proposal lacks comprehensive detail regarding construction and pollution risks, failing to allow for a proper evaluation of potential environmental effects. It entails

significant seabed preparation and installation works in a challenging Atlantic environment, yet fully developed Construction Environmental Management Plans and Pollution Prevention Plans are absent. Instead, the application depends on mitigation and contingency measures that are intended to be developed after consent has been granted, which hampers any meaningful assessment of their adequacy and effectiveness.

This dependence on undefined future measures raises serious concerns, particularly given the vulnerability of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that could be harmed by sediment disturbance and contamination. Although the application identifies risks such as sediment mobilisation and potential chemical or oil spills, it fails to present adequate information on how these risks will be prevented, managed, or monitored.

There is significant uncertainty surrounding the scale and behaviour of sediment plumes resulting from the disturbance of the seabed and cable installation. Without thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological repercussions of these impacts. This uncertainty also applies to the potential effects on marine species and habitats identified as sensitive in the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether sufficient safeguards are established to address pollution incidents. This introduces procedural risks and undermines the capacity of the competent authority to appraise environmental protection measures at the decision-making stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is imperative that significant effects and mitigation measures be assessed prior to granting consent, and the absence of such information renders a lawful determination impossible. The application also fails to showcase adherence to policy requirements concerning environmental protection and water quality.

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

## **FISHERIES AND MARINE LIFE**

The application presents a range of significant deficiencies in its assessment of the potential impacts on marine life and fisheries, raising considerable concerns among the local community. Notably, the evaluation of fisheries and marine ecosystems is inadequate and fails to robustly address ecological and socio-economic implications.

The waters off the West Lewis coast host a rich marine environment and an active fishing industry, yet the proposal does not convincingly show that these vital uses and habitats will remain protected or maintained in the face of development.

A critical concern is the flawed assumption that the displacement of fishing activities can occur without serious consequences. The application lacks evidence that alternative fishing grounds are available, accessible, and capable of accommodating the added pressure that would arise from such displacement. This omission is crucial, as it could lead to overfishing in other areas, adversely affecting the local fleet and their livelihoods. Without a thorough and evidence-based assessment, understanding the true impacts on fisheries and community welfare is impossible.

Additionally, the proposal poses significant risks to marine species, particularly due to the underwater noise created during construction activities. The extensive use of high-energy hammer piling is expected to disturb marine life over large distances, impacting species like dolphins. The anticipated disturbance to a considerable portion of the local bottlenose dolphin population is alarming, yet the application minimises these effects without sufficient corroborating evidence.

There is also a troubling inconsistency within the application concerning the requirement for licenses to permit harm to European Protected Species. While the need for such licences is acknowledged, the impacts are simultaneously downplayed as negligible. This contradiction calls into question the credibility of the assessment and raises alarm about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Furthermore, the assessment neglects to address the cumulative impacts from multiple factors, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a holistic evaluation of these combined pressures, the overall impact on marine ecosystems and socio-economic conditions remains indeterminate.

From a policy standpoint, the application falls short of demonstrating compliance with the National Planning Framework 4 and the National Marine Plan. It does not establish that the development can coexist with existing marine users or avert unacceptable impacts on marine biodiversity, thereby failing to support the notion of sustainable development.

In summary, the shortcomings in evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal contradictions make the assessment incomplete and unreliable. These issues collectively hinder a proper evaluation of the repercussions on marine life and fisheries, leaving local concerns unaddressed.

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The assessment of onshore infrastructure is fundamentally incomplete, failing to recognise the full extent of impacts associated with what constitutes a single integrated

project. The connection between the offshore turbines and onshore works is inherent, yet they are analysed separately, leading to a disjointed evaluation that conceals the real scale of environmental and socio-economic consequences.

Key onshore elements involve cabling that crosses protected moorland, the construction of a substation in proximity to Stornoway, and the associated infrastructure necessary for access through sensitive landscapes. These activities necessitate excavation in areas of deep peat, notably within Barvas Moor, an important carbon store and ecologically valuable habitat. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application obstructs a proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered in unison; however, the division of offshore and onshore elements obscures the comprehensive impacts on peatlands, habitats, and local communities.

There exist significant risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not show that the impacts on these habitats have been thoroughly evaluated or that adequate avoidance measures have been implemented, resulting in a marked evidential gap concerning biodiversity protection.

Concerns are also raised regarding carbon balance. Disturbing peatland releases stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The application fails to adequately tackle this concern or illustrate that the overall carbon balance is advantageous.

Additionally, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application does not provide proof that the requisite consents or processes have commenced, thus casting doubt on deliverability and lawful execution.

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

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

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The 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 failure to adequately assess the impacts on tourism represents a significant oversight, particularly given the importance of this sector to the Isle of Lewis's economy. Tourism thrives on the region's stunning coastline, largely untouched landscape, dark skies, and sense of remoteness. Despite the application indicating that

86% of visitors are attracted by the scenery, it lacks a thorough evaluation of how large-scale offshore infrastructure could potentially influence visitor numbers, behaviours, and the overall economic contribution of tourism.

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

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

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

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

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

## **SUMMARY**

The 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.

**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: F202E999

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

**Dear Sir/Madam**

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted for marine licensing and Environmental Impact Assessment. The objection arises from an examination of the Environmental Impact Assessment Report and other relevant documents, revealing serious deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. There are fundamental issues regarding the scale, design, and proximity of the proposal in relation to statutory requirements, national policy, and sustainable development principles.

The application does not present a sufficient evidential foundation for a lawful decision. There is a lack of critical environmental data, limited and inconsistent baseline information, and many aspects of the proposal remain undefined. The flexible design framework complicates the assessment of potential significant effects. Furthermore, the reliance on unspecified mitigation measures prevents an evaluation of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack robust evidence.

Substantive policy conflicts are evident. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially regarding biodiversity, natural areas, cultural heritage, and public health. It does not prove that it can meet national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts challenge the statutory tests necessary for consent and hinder the competent authority's ability to determine if the development aligns with policy requirements.

The proposal's scale is unprecedented for this area, with large turbines located near the shoreline, raising substantial concerns about landscape capacity, visual impact, and environmental repercussions. In light of the insufficient information, reliance on unclear mitigation strategies, evidential shortcomings, and clear policy non-compliance, it is apparent that the application is incomplete and does not support a lawful decision. Therefore, the precautionary principle should be applied in this case.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The application fundamentally fails to provide a full and transparent account of the likely environmental effects due to its reliance on an undefined Project Design Envelope. This lack of commitment to specific turbine dimensions, layouts, or

configurations introduces considerable uncertainty, thereby undermining the assessment's integrity. As a result, the impacts outlined may not accurately reflect the development that would ultimately be constructed, hindering both public understanding and the competent authority's ability to grasp the true extent of environmental effects.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that remain undefined. By seeking consent based on the premise that environmental harm will be addressed in subsequent stages, it obstructs any meaningful evaluation of effectiveness or assessment of residual impacts. This deferral of crucial information until after consent is granted is procedurally unacceptable and contradicts the intentions of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies must be clearly established prior to determination.

There are also notable gaps in baseline data, limitations in methodology, and an overreliance on assumptions rather than site-specific evidence. Such deficiencies lead to uncertainty regarding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects lack robust supporting data. The absence of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

Consequently, the application does not meet the evidential threshold set out 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 adherence to National Planning Framework 4, particularly in aspects related to biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been thoroughly assessed or that appropriate safeguards are established.

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

## **MARINE ECOLOGY AND PROTECTED SPECIES**

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

A significant gap in the assessment pertains to otters, classified as a European Protected Species. The application neglects to properly recognise and evaluate their active utilisation of coastal areas for foraging and movement. The absence of consideration for their core foraging range and behavioural patterns leads to an inadequate assessment of the potential effects arising from construction disturbance, noise, and increased activity. This oversight compromises the conclusions drawn regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks suffers from methodological shortcomings, particularly the reliance on aerial surveys which introduce notable detection bias under Atlantic conditions. Such an approach is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The omission of relevant data further contributes to an incomplete baseline and diminishes the reliability of the conclusions made.

These methodological deficiencies result in conclusions of negligible or non-significant effects that are based on assumptions rather than solid evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including variations across seasons and broader ecosystem interactions. This creates uncertainty regarding the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, given that protected species have not been adequately identified or assessed. The uncertainty introduced by these shortcomings prevents a definitive exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, it is not lawful to grant consent.

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

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The assessment of the proposed development presents substantial flaws, characterised by significant evidence gaps and internal contradictions that challenge its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. However, the application does not adequately demonstrate that these species will remain unaffected, failing to meet the necessary evidential standard. The placement of turbines within key foraging areas and migratory pathways raises critical concerns, yet the assessment does not sufficiently evaluate the risks associated with displacement,

collision, or habitat loss.

A critical inconsistency arises within the application, wherein the developer asserts that there will be no significant adverse effects while simultaneously submitting a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This contradiction undermines the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence. Furthermore, the assessment lacks adequate proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will not face negative impacts. The significance of these vital feeding grounds is not fully recognised, and reliance on modelling techniques introduces uncertainty, particularly concerning species like Kittiwakes and Fulmars, which are in severe decline. The methodologies used are likely to underestimate mortality, especially in instances where baseline data is insufficient and behavioural responses are not comprehensively understood.

The siting of turbines within a recognised migratory corridor adds another layer of risk, effectively obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to thoroughly assess the long-term consequences of sustained mortality in this corridor or the potential effects on species with relatively small global populations. From a regulatory standpoint, the application does not satisfy the evidential requirements necessary to affirm no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside data gaps and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been reached. This invokes the precautionary principle and precludes a lawful conclusion in support of consent.

The identified deficiencies also represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy. Collectively, these factors render the assessment unreliable due to methodological shortcomings, internal inconsistencies, and insufficient evidence. Such inadequacies obstruct a thorough evaluation of impacts and contribute to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The assessment of cultural heritage and community identity fails to recognise the West Lewis coastline as a living cultural landscape. This landscape is shaped by the connections between the environment, language, tradition, and community. The application reduces heritage to isolated and static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are treated inadequately. These sites serve as active places for burial and spiritual practice. However, they are characterised as static features, which overlooks their continued use and the impact of development on their setting. This mischaracterisation

leads to an incomplete evaluation of the cultural effects and ignores their importance in community life.

The assessment also overlooks intangible cultural heritage, which includes the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These factors are central to the area's identity, yet they are entirely absent from the assessment, representing a significant omission. Without considering these elements, the cultural impact of the proposed development cannot be accurately understood.

There are also concerns regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity, recognised as characteristics of an Indigenous People. However, no process of Free, Prior and Informed Consent has been undertaken. The lack of meaningful engagement undermines the legitimacy of the assessment and does not reflect established principles of participation in decisions that affect cultural and environmental interests.

A significant procedural failure is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This assessment is essential for the competent authority to evaluate the social, cultural, and economic impacts on the island community. Without it, the determination of the application cannot be deemed lawful.

From a policy perspective, the deficiencies in the assessment conflict with National Planning Framework 4, especially concerning the protection of historic assets and places. The failure to acknowledge both tangible and intangible heritage, along with living cultural practices, deviates from policy requirements.

The collective failures to assess living heritage, intangible cultural value, community rights, and statutory obligations create a significant evidential gap. The cultural impacts of the development remain unassessed, and the application does not provide a sufficient basis for understanding the true cultural cost of the proposal.

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would create a continuous and overwhelming industrial presence, which would fundamentally alter this character and lead to a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient, failing to adequately represent the magnitude of this visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness.

There are significant methodological concerns regarding the selection and presentation

of visual viewpoints. Evidence indicates that these viewpoints may not accurately reflect the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been understated, which undermines the reliability of the assessment. Additionally, the assessment does not adequately evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Important sites like 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 sites as isolated assets fails to recognise their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these crucial relationships, altering the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This represents not only a visual impact but also a more extensive 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 concerning the protection of natural places and historic assets. The scale of change is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further diminishes any claims of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Thus, the resulting change is fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation measures. In conclusion, 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 hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

## **CONSTRUCTION AND POLLUTION RISKS**

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

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

details on preventative, control, or monitoring strategies for these risks.

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

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

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

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

## **FISHERIES AND MARINE LIFE**

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. However, the assessment provided in the application is inadequate, failing to deliver a thorough evaluation of both ecological and socio-economic impacts. It does not establish that these vital habitats and uses can be safeguarded or sustained without significant disruption.

A critical flaw in the application lies in its assumption that fishing activities can be relocated without adverse consequences. There is no evidence presented that alternative fishing grounds exist, are accessible, or can support additional pressures. This significant omission raises concerns about the potential for overfishing in other areas and the broader economic implications for the local fishing fleet. In the absence of a clear and evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Furthermore, the proposal presents considerable risks to marine species, particularly due to the underwater noise generated during construction. The prolonged use of high-energy hammer piling is likely to disturb marine life over extensive distances, notably affecting species such as dolphins. The anticipated disturbance to a considerable portion of the local bottlenose dolphin population warrants serious concern, yet the application downplays these effects without adequate supporting evidence.

There is an evident inconsistency in the application, as it acknowledges the necessity of licences for permitting harm to European Protected Species while simultaneously characterising these impacts as negligible. This contradiction undermines the credibility of the assessment and raises significant questions regarding adherence to the Habitats Regulations, especially given the predicted level of harm that requires legal authorisation.

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

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

In summary, the shortcomings regarding evidence on fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies contribute to an assessment that is incomplete and unreliable. These deficiencies impede a robust evaluation of impacts on marine life and fisheries.

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

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

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

The proposal raises serious concerns regarding carbon balance, as the disturbance of peatland can release stored carbon, leading to a potential carbon debt that contradicts the principles of renewable energy development. The application does not sufficiently address this matter nor does it demonstrate that the overall carbon balance remains advantageous. Furthermore, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application does not supply evidence that the requisite consents or processes have been initiated, which calls into question the deliverability and lawful implementation of the project.

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

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

## **TOURISM**

The evaluation of tourism impacts presented in the application is notably inadequate, omitting critical insights into the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Although it is acknowledged that 86% of visitors are attracted by the scenery, the application fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

This sector has experienced considerable growth, with tourism revenue increasing from £65 million in 2017 to over £81.5 million and sustaining more than 1,000 jobs, which represents up to 16% of the island's economy. However, the application neglects to model the potential effects of seascape industrialisation and loss of environmental quality on Tourism Gross Value Added and broader economic resilience. Such an oversight prevents the determination of whether the development would yield a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the assessment does not adequately address the significance of environmental quality for tourism, particularly regarding how unspoiled landscapes and

dark skies enhance visitor experiences and foster emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this shortcoming, resulting in a considerable gap in understanding impacts on an acknowledged and growing component of the local economy.

In an island community with limited economic diversity, the failure to evaluate tourism impacts has broader implications for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment means that these economic vulnerabilities remain unevaluated, as required under 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 benefits. It also runs counter to strategic objectives that prioritise tourism as a growth sector, and insufficient evidence is presented for the competent authority to assess the economic consequences of the proposal.

Overall, the shortcomings in quantifying tourism impacts, evaluating the environmental factors that drive visitor behaviour, and recognising the economic dependencies of the island culminate in a significant evidential gap. This gap undermines a robust assessment of economic effects and supports the conclusion that the application is incomplete.

## **SUMMARY**

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. This application echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. It is presented now under a supposedly stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

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

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

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

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

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

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

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

### **Additional Comments**

This really is the thin end of the wedge. These turbines are being forced upon the population of the Scottish highlands, spoiling the fairly pristine landscape, views, wildlife and creating very little social legacy or jobs for locals. Scotland has the most expensive energy in Europe and until now many of us couldn't even get a smart meter, that's how neglected the population has been.

**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: 312F55AD

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

**Dear Sir/Madam**

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted for marine licensing and Environmental Impact Assessment. The review of the Environmental Impact Assessment Report and accompanying documents reveals significant deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural heritage.

The documentation provided fails to offer adequate evidence for a lawful decision. There are critical gaps in environmental data, while the baseline information presented is limited and inconsistent. Essential components of the proposal remain undefined. The flexible design framework complicates the understanding of possible significant effects, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the information does not allow for a thorough understanding of the impacts on the environment, culture, or community, and claims regarding negligible or non-significant effects lack robust support.

The proposal presents clear and substantial conflicts with policy. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements for protecting biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests needed for consent and impair the competent authority's ability to conclude the development is acceptable under policy guidelines.

The scale of this proposal is unprecedented for the area, with large turbines planned to be positioned close to the shoreline, raising significant issues around landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle should be applied.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report is fundamentally flawed and fails to offer a comprehensive and transparent account of the anticipated environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, lacking commitments to specific turbine dimensions, layouts, or configurations,

creates considerable uncertainty and hinders a reliable worst-case scenario analysis. This compromises the assessment's integrity and prevents both the public and the competent authority from grasping the true scale of environmental impacts.

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

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

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

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

## **ASSESSMENT OF ALTERNATIVES**

The application fails to provide a structured and reasoned comparison of realistic alternatives, which is a critical requirement under the Environmental Impact Assessment regime. Instead of thoroughly assessing potential options based on their environmental effects, it presents a narrative that outlines the project's evolution. This lack of rigorous analysis means that less harmful alternatives have not been properly identified or selected over more damaging options.

Furthermore, there is an absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has adequately considered

placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be less severe. Given the delicate nature of the West Lewis coastline, and the importance of proximity to the shore in determining impacts, this oversight undermines the validity of the proposed siting as the least damaging option.

These shortcomings also extend to the assessment of cable routing and landfall, where there is insufficient evidence of exploration of alternative routes that could avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been effectively implemented, with an overreliance on post-design mitigation measures.

As a result, the application does not demonstrate that environmental harm has been adequately minimised through site selection, layout, and routing of infrastructure. This represents a failure to adhere to the established mitigation hierarchy, obstructing the competent authority's ability to ascertain whether more appropriate and less harmful alternatives are available. Without a thorough assessment of alternatives, it cannot be established that the proposal is sustainable or compliant with relevant policy.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, particularly with respect to the protection of natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not undergone adequate evaluation and cannot be lawfully determined.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The assessment of marine ecology and protected species in the application is inadequate, resulting in a lack of a complete understanding of the ecological receptors in the West Lewis coastal environment. This area is biologically active and sensitive, yet the methodologies used fall short of capturing essential data on species presence, behaviour, and habitat utilisation. Consequently, the assessment does not provide a solid evidential basis for evaluating potential impacts.

One critical gap in the assessment is the treatment of otters, classified as a European Protected Species. The application does not adequately recognise their active use of coastal regions for foraging and movement. This oversight regarding their core foraging range and behavioural patterns leads to an insufficient evaluation of how construction disturbances, noise, and increased activity might affect them. Thus, the assessment's conclusions regarding the absence of significant effects on otters are fundamentally flawed.

The assessment also inadequately addresses basking sharks, relying heavily on aerial surveys which introduce considerable detection bias, especially under Atlantic conditions. Such an approach is likely to underestimate their presence, particularly when compared to established land-based observations that indicate frequent use of

these waters. The failure to include or give proper consideration to this data results in an incomplete baseline, undermining the reliability of the conclusions reached.

These methodological shortcomings mean that the claims of negligible or non-significant effects are primarily based on assumptions rather than solid evidence. The lack of sufficient baseline data hampers any meaningful evaluation of cumulative and indirect impacts, seasonal variations, and broader ecosystem interactions, leaving considerable uncertainty regarding the actual risks 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 the identification and assessment of protected species have not been conducted appropriately. This uncertainty prevents the exclusion of adverse effects beyond a reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, the granting of consent is not legally justifiable.

Overall, the combination of incomplete baseline data, inadequate methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies obstruct a thorough evaluation of the impacts on marine ecology and protected species, reinforcing the notion that the application lacks a robust evidential foundation.

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The assessment of the proposed development is fundamentally flawed, characterised by substantial gaps in evidence and internal contradictions that fundamentally undermine its conclusions. It is crucial to highlight that the west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already experiencing decline. The application fails to provide adequate evidence to the required standard that these species will not face adverse effects. The proposed site lies within vital foraging areas and migratory pathways, yet the implications of habitat loss, collision risk, and displacement have not been thoroughly evaluated.

The application presents a glaring contradiction; it states there are no significant adverse effects while simultaneously making a case for derogation under the Habitats Regulations, which is typically only invoked when significant harm is anticipated. This inconsistency raises serious doubts regarding the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence provided. Furthermore, there is insufficient evidence to demonstrate that seabirds linked to protected areas, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds has not been adequately recognised, and reliance on modelling techniques introduces a level of uncertainty, particularly concerning species like Kittiwakes and Fulmars that are already in severe decline. The methodologies used likely underestimate mortality rates, especially given the incomplete baseline data and insufficient understanding of behavioural responses.

Placing turbines within a recognised migratory corridor adds another layer of significant risk, creating a barrier in a primary flight path used by species migrating between the

United Kingdom and Iceland. The assessment fails to sufficiently consider the long-term consequences of ongoing mortality in this corridor or the potential impacts on species with relatively small global populations.

Regulatory scrutiny reveals that the application does not fulfil the evidential threshold necessary to ascertain no adverse effect on the integrity of protected sites. The combination of conflicting conclusions, alongside data deficiencies and limitations in modelling, indicates that the standard of evidence beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, which impedes reaching a lawful conclusion supportive of consent. Moreover, the identified deficiencies demonstrate 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 be adversely affected directly contravenes national policy.

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

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The assessment related to community identity and cultural heritage is fundamentally flawed and fails to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply interwoven. The application adopts a simplified view, treating heritage as a collection of static assets rather than acknowledging their dynamic social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites of burial and spiritual practice, yet the assessment reduces them to mere static features, neglecting their ongoing use, significance, and the implications of development on their surroundings. This mischaracterisation leads to an inadequate evaluation of cultural effects and overlooks their integral role in community life.

The assessment further neglects to address intangible cultural heritage, including the Gaelic language, traditions, and the long-standing connection between the community and the coastal environment. These elements are essential to the area's identity but are completely excluded from the evaluation, representing a considerable oversight. Without acknowledging these factors, the cultural impact of the proposed development cannot be accurately assessed.

Concerns extend to community rights and engagement as well. The Gaelic-speaking population embodies a unique cultural identity akin to that of an Indigenous People, yet no process of Free, Prior and Informed Consent has been pursued. This lack of meaningful engagement compromises the assessment's credibility and fails to adhere

to recognised principles of participation in decisions that impact cultural and environmental interests.

A further critical procedural error is the omission 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, thereby rendering a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal in direct conflict with National Planning Framework 4, especially concerning the safeguarding of historic assets and places. The neglect to consider both tangible and intangible heritage, coupled with the failure to recognise living cultural practices, represents a clear deviation from established policy requirements.

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

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The assessment of social impacts, health, and wellbeing is fundamentally lacking, with insufficient transparency for a lawful evaluation. Although a Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, the complete report has not been made public. This represents a considerable evidential gap that hinders both public understanding and the competent authority's ability to assess the full scope of social risks highlighted by the developer's own research.

Summaries available indicate that residents are currently facing significant stress, anxiety, and concern due to the proposal's scale and proximity. These consequences arise from direct community engagement and are thus grounded in reality rather than speculation. However, the absence of the full assessment restricts proper examination of these findings and limits the determination of their significance in the decision-making process.

Furthermore, there is evidence suggesting that the proposal threatens community identity and cohesion, with "cultural loss" identified within the developer's own findings. Despite this, these social impacts have not been adequately included in the main application or given the necessary weight in considerations. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. It is critical to have a comprehensive understanding of social, economic, and health

impacts for developments of this magnitude, especially when community character and functioning may be at risk. The failure to provide the full dataset means that the application does not present a complete evidential basis necessary for evaluating the balance between benefits and harms.

From a policy standpoint, the application does not show compliance with National Planning Framework 4 regarding health and wellbeing. Development must not only support positive health outcomes but also avoid causing harm; however, the available evidence points to existing adverse effects that remain undisclosed. Without access to the full assessment, compliance with this policy cannot be established.

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

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

### **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The assessment of visual impacts, seascape, and landscape is significantly inadequate and does not truly reflect the extent of change or the sensitivity of the environment in West Lewis. Characterised by its open Atlantic horizon and undeveloped nature, the coastline conveys a strong sense of remoteness. The planned introduction of large-scale turbines near the shoreline would create an ongoing and overwhelming industrial presence, which would fundamentally alter this character and result in a permanent and irreversible transformation of the landscape.

The application fails to accurately represent the scale of this visual change. Given their size and proximity, the turbines would dominate the views from residential areas, historic sites, and well-frequented coastal locations. Such dominance would directly impact visual amenity and undermine the defining qualities of naturalness and remoteness. The assessment does not effectively convey the significance of these impacts within the context of such a sensitive landscape.

Concerns also arise regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately capture the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This situation raises the possibility that the magnitude of the visual impact has been understated, thus compromising the assessment's reliability.

Another notable deficiency is the failure to evaluate the interconnected relationship

between the landscape, seascape, and cultural heritage. Important sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape setting linked visually and spatially to the Atlantic horizon. The assessment considers these heritage assets in isolation rather than recognising their interdependence, resulting in an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these vital connections, altering how heritage assets are perceived and disrupting their links to the natural horizon. This transformation represents not merely a visual impact but a wider cultural and spatial harm that has not been properly assessed in the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the safeguarding of natural places and historical assets. The magnitude of change is incompatible with the need to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of compliance with policy.

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

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

## **CONSTRUCTION AND POLLUTION RISKS**

The absence of detailed management plans is a significant flaw in the application, which relies heavily on undefined future measures. This deferral of critical environmental safeguards prevents an adequate evaluation of whether the necessary protections against pollution events are in place. Without robust emergency response procedures and contingency planning prepared prior to consent, there is a procedural risk that undermines the authority's ability to assess environmental protection measures effectively.

The sensitivity of the West Lewis coastline heightens concerns regarding the incomplete assessment of construction and pollution risks. This area is home to clean coastal waters and important habitats that could be adversely affected by sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and the potential for chemical or oil spills, it fails to provide sufficient detail on how these risks will be mitigated or monitored effectively.

Moreover, there is considerable uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without

robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty extends to the potential effects on already identified sensitive marine species and habitats within the broader assessment.

From a regulatory standpoint, the failure to include detailed Construction Environmental Management Plans or Pollution Prevention Plans contradicts the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and necessary mitigations are assessed prior to the granting of consent. The application's deficiencies in demonstrating compliance with policy requirements related to environmental protection and water quality further illustrate its incomplete nature.

Taken collectively, the lack of clearly defined mitigation measures and uncertainty regarding potential impacts result in a materially deficient assessment. These shortcomings inhibit a thorough evaluation of construction and pollution risks and highlight the application's overall incompleteness.

## **FISHERIES AND MARINE LIFE**

The proposed development raises significant concerns regarding its impact on the local fishing industry and marine life. The waters off the West Lewis coast are home to a diverse marine ecosystem and a thriving fishing community, yet the application fails to adequately protect these vital uses and habitats from disruption. A major concern is the unfounded assumption that fishing activities can be relocated without negative repercussions. The absence of evidence proving that alternative fishing grounds exist or can accommodate increased pressure is troubling, as such displacement could lead to overfishing and broader economic repercussions for local fishers. Without a thorough, evidence-based assessment, the potential impacts on fisheries and community livelihoods remain unclear.

Moreover, the proposal poses substantial risks to marine species, particularly through the noise generated by construction activities. The use of high-energy hammer piling over extended periods is expected to disturb species over considerable distances, including dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application tends to minimise these potential effects without adequate supporting evidence.

There is a notable contradiction within the application regarding the necessity for licences to allow harm to European Protected Species, while simultaneously downplaying impacts as negligible. This inconsistency calls into question the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, particularly when harm is predicted to require legal authorisation.

Additionally, the assessment fails to address cumulative impacts stemming from various pressures, such as habitat disturbance, noise pollution, and fishing activity displacement. Without a detailed evaluation of these combined effects, it is impossible

to ascertain the overall impact on marine ecosystems and the socio-economic landscape.

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

In summary, the lack of substantiated evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment culminate in a comprehensive failure to evaluate the potential impacts on marine life and fisheries effectively.

### **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The assessment of the onshore infrastructure associated with the project is fundamentally flawed, failing to address the comprehensive impacts stemming from what constitutes a single integrated development. The offshore turbines and the onshore works are interconnected, yet they are evaluated in isolation, leading to a fragmented assessment that obscures the true magnitude of environmental and socio-economic consequences.

Key onshore components include the cabling that traverses protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure through ecologically sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, a significant carbon reservoir and ecologically sensitive habitat. The application does not present a thorough evaluation of these impacts, hindering a complete understanding of the project's overall environmental footprint.

The application also neglects to assess onshore impacts adequately, which prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates a holistic consideration of all project components; however, the disjointed treatment of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain unclear.

Significant risks to sensitive habitats, such as machair systems and peatland environments that are subject to policy protection, are also present. The application fails to demonstrate that the effects on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, creating a notable evidential gap regarding biodiversity protection.

Moreover, concerns arise regarding carbon balance due to the disturbance of peatland, which can release stored carbon and potentially create a carbon debt, undermining the objectives of renewable energy development. The application does not sufficiently address this issue or prove that the overall carbon balance is beneficial.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is insufficient evidence that the necessary consents or procedures have been initiated, leading to questions about the project's deliverability and lawful execution.

From a policy standpoint, the failure to assess the entire project and demonstrate the protection of peatlands, habitats, and land use interests contradicts 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 components, the lack of a comprehensive assessment, and the absence of evidence regarding environmental and land use impacts render this aspect of the application incomplete and unreliable, obstructing a lawful determination.

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The omission of any assessment concerning dark skies and nocturnal wildlife represents a significant flaw in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism appeal. The proposal introduces permanent red aviation lighting that would be visible over extensive distances, creating a disruptive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

Moreover, the application does not evaluate the effects of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the importance of dark skies to the area's identity and the growth of tourism sectors like astro-tourism. The absence of these assessments points to a clear deficiency in the overall landscape and environmental evaluation.

More alarmingly, there is no examination of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to phototaxis, which can cause disorientation and an increased risk of collisions. The lack of a lighting impact assessment or phototaxis study means there is no analysis of how aviation lighting could affect these species or heighten mortality risks.

This gap is exacerbated by the dependence on daytime survey data in the ornithological assessment, which fails to account for nocturnal behaviours and associated dangers. Species such as Kittiwakes, which may forage or migrate at night, are susceptible to disorientation from artificial lighting, yet this risk has not been examined. The absence of site-specific night-time data creates a crucial shortcoming in understanding ecological consequences.

Without an evaluation of nocturnal impacts, it is impossible to ascertain whether

protected species or designated sites may be adversely affected. The necessary evidential standard to demonstrate the absence of adverse effects beyond reasonable scientific doubt cannot be achieved, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contravenes National Planning Framework 4 regarding the safeguarding of natural areas and environmental quality. It also diminishes the comprehensive assessment of landscape and seascape effects, as the character of night-time environments is a fundamental aspect of the overall ecology.

In summary, the failure to assess dark skies and nocturnal wildlife creates a substantial evidential void. The absence of baseline data, impact modelling, and specific species analysis renders the application incomplete and incapable of justifying a lawful determination.

## **TOURISM**

The tourism sector on the Isle of Lewis has seen remarkable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. However, the application under review lacks a crucial assessment of the tourism impacts, failing to evaluate the economic and social ramifications for this vital sector. Tourism is intrinsically linked to the area's wild coastline, near-pristine landscape, dark skies, and overall sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it does not provide a quantified analysis of how large-scale offshore infrastructure may alter visitor numbers, behaviours, or their overall economic contribution.

The assessment neglects the importance of environmental quality in sustaining tourism, particularly regarding the appeal of unspoiled landscapes and dark skies to enhance visitor experience. The lack of a Dark Skies Assessment exacerbates this deficiency, creating a significant gap in understanding the potential impacts on nature-based tourism and astro-tourism, which are emerging markets. Furthermore, the failure to model how the industrialisation of the seascape and loss of environmental quality could impact Tourism Gross Value Added or the overall economic resilience signifies a serious oversight. Without this analysis, it is impossible to ascertain if the development would yield a net economic benefit or, conversely, undermine an established and growing sector.

In the context of an island community characterised by limited economic diversification, this oversight carries broader implications for local employment, businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been evaluated as mandated by the Islands (Scotland) Act 2018. From a policy standpoint, the application fails to illustrate compliance with National Planning Framework 4, particularly concerning economic impact and the necessity to demonstrate net benefit. It also contradicts strategic objectives that recognise tourism as a priority growth sector and does not furnish adequate evidence for the competent authority to assess the

economic implications of the proposal.

Collectively, the lack of quantification of tourism impacts, the disregard for environmental factors influencing visitor behaviour, and the neglect of the island's economic dependencies culminate in a significant evidential gap. This prevents a thorough evaluation of the economic effects and leads to the conclusion that the application is fundamentally incomplete.

## SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development, as it does not align with statutory obligations, national policy, and necessary evidential standards. This proposal mirrors the key issues that resulted in the refusal of the Lewis Wind Power application in 2008, where the extent of industrialisation was deemed unacceptable. Despite now being under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the deficiencies in the current application remain significant.

A thorough review reveals a lack of a complete and reliable evidential basis for determination. There are notable deficiencies in baseline data, the application employs an undefined design envelope, and it relies on unspecified mitigation measures. Furthermore, there is an absence of critical impact pathways, particularly regarding nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, hindering a full comprehension of the likely significant effects or residual impacts.

Procedural shortcomings are also evident. The failure to provide a compliant Island Communities Impact Assessment breaches the statutory requirements of the Islands (Scotland) Act 2018. Additionally, the omission of the complete Social Impact Assessment is a material oversight. Such deficiencies hinder the competent authority's ability to assess the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

Moreover, the proposal is directly at odds with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage, nor does it establish that health and wellbeing impacts are acceptable. The lack 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 adequately assessed, clouding the understanding of impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals are present, and inconsistencies exist within these evaluations. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been fulfilled, which invokes the precautionary principle and

precludes a lawful conclusion that impacts are acceptable.

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

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

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

### **Additional Comments**

This is a disaster for the people of Lewis who have already endured over 3 years of uncertainty affecting both physical and mental health.

The local authority totally misrepresented when they disgracefully made a statement saying the majority of people were in favour of the scheme and accepted it. I don't know a single person who supports it.

Please do the right thing and refuse this application as once it starts there is no going back.

Scotland already produces 80% more power than it can ever consume and it's totally unnecessary.

Please refuse this application and site the wind farm in a more appropriate position.

**Yours faithfully,**

[Redacted]

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