

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The review of the Environmental Impact Assessment Report and its supporting documentation reveals several material deficiencies related to planning, environmental considerations, cultural aspects, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of this proposal, along with its proximity to the shore, raise significant concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

There is a notable lack of critical environmental data within the application, with baseline information being both limited and inconsistent. Key components of the proposal remain undefined, and the flexible design framework obstructs a clear understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures undermines the ability to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence.

The application exhibits clear conflicts with established policy. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural habitats, cultural heritage, and health and wellbeing. The proposal does not demonstrate compliance with national requirements for the protection of biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests necessary for consent and impair the competent authority's capacity to determine the development's acceptability in policy terms.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies, failing to deliver a full, transparent, or reliable account of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, lacking specific commitments to turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty undermines the integrity of the assessment and hinders a consistent application of a worst-case scenario. Consequently, the impacts outlined may not correspond to the actual development, leaving both the public and the competent authority without a clear understanding of the true extent of environmental effects.

Consent is sought based on the reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. This approach defers essential information to post-consent stages, obstructing any meaningful evaluation of effectiveness or assessment of residual impacts. Such procedural deficiencies contravene the intentions of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures are clearly established before any determination.

Moreover, there are critical evidential shortcomings, including gaps in baseline data and limitations in methodology, alongside a reliance on assumptions rather than site-specific evidence. This results in uncertainty about the scale and significance of impacts, particularly as conclusions of negligible or non-significant effects are presented without robust supporting data. The insufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is inconsistent with statutory requirements.

As a result, the application does not satisfy the evidential threshold under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This activates the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that appropriate safeguards exist.

In conclusion, the combination of an undefined design envelope, the lack of specified mitigation, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and robust assessment of environmental effects, leaving the competent authority unable to make a determination based on the information submitted.

ASSESSMENT OF ALTERNATIVES

The application lacks a structured and evidence-based assessment of alternatives, which is essential under the Environmental Impact Assessment regime. It provides a narrative detailing the project's evolution instead of offering a reasoned comparison of realistic alternatives based on environmental effects. This failure to properly identify, assess, and select less harmful options in favour of more damaging solutions is a

significant shortcoming.

There is no clear comparison of alternative offshore locations, development scales, or design configurations. The developer has not convincingly demonstrated that the possibility of 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 importance of proximity to shore in assessing impacts highlight the critical nature of this analysis, and its absence raises doubts about whether the proposed siting is indeed the least damaging option.

Furthermore, the assessment of cable routing and landfall is inadequate, as it does not provide sufficient evidence that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been appropriately implemented, relying instead on post-design measures.

Consequently, the application fails to demonstrate that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This represents a deviation from the established mitigation hierarchy, hindering the competent authority's ability to ascertain whether more appropriate and less harmful alternatives are available. Without a rigorous alternatives assessment, it cannot be asserted that the proposal is sustainable or compliant with policy.

From a policy standpoint, this inadequacy compromises adherence to the National Planning Framework 4, particularly concerning the safeguarding of natural places, cultural heritage, and community wellbeing. The absence of a structured comparative assessment constitutes a material omission, reinforcing the overall conclusion that the application has not undergone adequate evaluation and is thus unable to support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species is fundamentally lacking, failing to deliver a complete and dependable understanding of ecological receptors within the West Lewis coastal environment. This area represents a highly sensitive and biologically active marine system; however, the baseline data provided is incomplete, and the methodologies employed do not sufficiently capture the presence, behaviour, and habitat use of species. Consequently, the assessment does not establish a solid evidential basis necessary for accurately evaluating impacts.

A significant oversight pertains to otters, which are recognised as a European Protected Species. The application inadequately acknowledges and evaluates their active use of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns results in an inadequate assessment of potential impacts from construction disturbance, noise, and increased activity. This deficiency undermines any claims regarding the absence of significant effects on this species.

Further issues arise in the evaluation of basking sharks, where an overreliance on aerial surveys introduces considerable detection bias, especially under Atlantic conditions. This method is likely to underestimate their presence when compared to established land-based observations that indicate frequent usage of these waters. The failure to adequately incorporate or consider such data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

Due to these methodological flaws, the claims of negligible or non-significant effects are rooted in assumptions rather than substantive evidence. Additionally, the lack of adequate baseline data hinders the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty obscures the true extent of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set forth by the Environmental Impact Assessment regime and the National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty generated means that it is impossible 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 unsubstantiated conclusions renders the assessment unreliable. These shortcomings impede a thorough evaluation of the 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 application fails to demonstrate that internationally important seabird populations will not be adversely affected, which puts it in direct conflict with national policy regarding biodiversity protection. The west coast of the Isle of Lewis is home to many seabird species, several of which are already in decline. The proposed development is situated within crucial foraging areas and migratory pathways, yet the assessment does not adequately evaluate the risks associated with displacement, collision, or habitat loss.

There is a significant contradiction within the application, as the developer asserts that there will be no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises doubts about the reliability of the ornithological assessment, revealing that its conclusions lack the necessary support from the available evidence. The assessment does not convincingly show that seabirds connected to protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. The methodologies employed are likely to underestimate mortality, particularly given incomplete baseline data and the incomplete understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor presents an additional and severe risk, forming a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term consequences of sustained mortality in this corridor are not sufficiently addressed, nor are the potential impacts on species with smaller global populations.

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

The flaws identified in the assessment represent a failure to comply with National Planning Framework 4 regarding the safeguarding of natural assets. Collectively, these deficiencies result in an unreliable assessment due to internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a thorough evaluation of impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, represents a major shortcoming in the assessment. These sites serve as active places for burial and spiritual practice; however, they have been categorised merely as static features. This oversight fails to acknowledge their ongoing use and significance, as well as the potential impact of development on their setting. Such a mischaracterisation leads to an inadequate evaluation of cultural effects and neglects their importance within community life.

Furthermore, the assessment overlooks intangible aspects of cultural heritage, including the Gaelic language, local traditions, and the community's enduring relationship with the coastal environment. These elements are vital to the area's identity and have been wholly disregarded, marking a significant omission. The lack of consideration for these factors means the cultural impact of the proposed development cannot be fully comprehended.

There are also serious concerns regarding community rights and engagement. The Gaelic-speaking population, which possesses distinct characteristics of an Indigenous People, has not been granted the opportunity for Free, Prior and Informed Consent. The absence of this meaningful engagement diminishes the credibility of the assessment and contradicts established principles of participation in decisions that affect cultural and environmental interests.

Additionally, a critical procedural gap exists due to the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal obligation

to evaluate the social, cultural, and economic impacts on the island community. This omission is significant enough to prevent a lawful determination.

From a policy standpoint, these inadequacies place the proposal in direct conflict with National Planning Framework 4, especially concerning the protection of historic assets and places. The failure to take into account both tangible and intangible heritage, and to recognise living cultural practices, represents a clear deviation from policy requirements.

Overall, the lack of assessment of living heritage, intangible cultural value, community rights, and adherence to statutory obligations results in a considerable evidential gap. The cultural impacts of the development have not been adequately assessed, and the application does not present a robust 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 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 assessment of the seascape, landscape, and visual impacts is significantly inadequate, failing to capture both the extent of change and the sensitivity of the environment. The West Lewis coastline, characterised by its open Atlantic horizon and undeveloped nature, possesses a profound sense of remoteness. The proposed installation of large-scale turbines near the shoreline would impose a continuous industrial presence that fundamentally alters this unique character, leading to a permanent and irreversible transformation of the landscape.

The application lacks an adequate representation of the magnitude of the visual changes that would occur. The size and proximity of the turbines would dominate views from residential areas, historical sites, and popular coastal locations, thereby directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of these impacts within the context of such a sensitive landscape.

Moreover, there are serious concerns regarding the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the visual impacts have been underestimated, which further compromises the validity of the assessment.

A critical shortcoming is the failure to recognise the interconnected relationship between the landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape framework, connected visually and spatially to the Atlantic horizon. The assessment approaches these heritage assets as isolated entities, neglecting their interdependence and leading to an incomplete evaluation of the impacts on their context and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and severing their connections to the natural

horizon. This constitutes not only a visual impact but also inflicts broader cultural and spatial damage that has not been sufficiently assessed within the application.

From a policy perspective, the proposal is at odds with National Planning Framework 4, which seeks to protect natural places and historic assets. The anticipated scale of change is inconsistent with the need to preserve landscape character, visual amenity, and the context of culturally significant sites. The lack of a thorough worst-case assessment further weakens any claims of compliance with policy requirements.

It is also evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would result in an unavoidable and dominant presence. The changes involved are fundamental and permanent, rather than reducible to an acceptable level through mitigation measures.

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

CONSTRUCTION AND POLLUTION RISKS

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

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

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

Moreover, the absence of detailed emergency response procedures adds to the growing concerns surrounding this application. By postponing contingency planning until after consent, the proposal hinders an evaluation of whether adequate safeguards

are established for responding to pollution incidents. This creates procedural risks and diminishes the capacity of the competent authority to assess the environmental protection measures before making a determination.

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

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

FISHERIES AND MARINE LIFE

The proposal presents significant shortcomings regarding the assessment of fisheries and marine life, failing to provide a thorough evaluation of ecological or socio-economic impacts. Off the West Lewis coast, the waters are home to a rich marine ecosystem and a thriving fishing industry. However, the application does not convincingly demonstrate that these vital resources can be preserved or maintained without considerable disruption.

A critical concern is the premise that fishing activities can be displaced without repercussions. The application lacks evidence to support the availability, accessibility, or capacity of alternative fishing grounds to accommodate the additional strain. This significant gap raises the risk of overfishing in other areas, which could have broader economic ramifications for the local fishing fleet. Without a clear, evidence-based evaluation, the potential impacts on fisheries and local livelihoods remain poorly understood.

Furthermore, the proposal poses serious risks to marine species, primarily due to the underwater noise produced during construction. The expected high-energy hammer piling over an extended duration is likely to disturb marine life over large areas, impacting species such as dolphins. The anticipated disturbance to a considerable portion of the local bottlenose dolphin population is alarming; nonetheless, the application downplays these effects without providing adequate supporting evidence.

There exists a troubling inconsistency within the application regarding the acknowledgment of the need for licenses to permit harm to European Protected Species, while simultaneously describing these impacts as negligible. This contradiction undermines the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, particularly in situations where anticipated harm necessitates legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents significant issues regarding the evaluation of onshore infrastructure, which is not fully addressed. This is a single integrated project, yet the assessment treats the offshore turbines and onshore works separately, leading to a fragmented understanding of the environmental and socio-economic impacts.

The onshore aspects include cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure that traverses sensitive landscapes. Excavation activities in these areas, especially on Barvas Moor, disrupt deep peat which is an important carbon store and an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, limiting the understanding of the project's total environmental footprint.

By not considering 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 separation of onshore and offshore elements results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

There are substantial risks posed to sensitive habitats, including machair systems and peatland environments that benefit from policy protection. The application fails to show that impacts on these habitats have been comprehensively assessed or that effective avoidance measures have been taken, creating a significant evidential gap concerning biodiversity protection.

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

From a policy viewpoint, the lack of a unified assessment of the project and the failure to demonstrate the protection of peatlands, habitats, and land use interests contradicts the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated significantly weakens the application.

In summary, the division of project components, the absence of a comprehensive assessment, and the lack of evidence on environmental and land use impacts make this aspect of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The failure to assess dark skies and nocturnal wildlife represents a significant oversight in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting will create a pervasive "wall of light" effect across the western horizon, fundamentally transforming the night-time environment.

Moreover, the application lacks an evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. Given the integral role of dark skies in the area's identity and in emerging sectors like astro-tourism, this omission is particularly concerning. The absence of such assessments creates a clear gap in the overall landscape and environmental evaluation.

Equally troubling is the lack of analysis regarding impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and increased collision risk. The application does not include any assessment of lighting impacts or phototaxis studies, resulting in a failure to understand how aviation lighting may affect these species or contribute to increased mortality.

This issue is exacerbated by the dependence on daytime survey data within the ornithological assessment, which fails to account for nocturnal activity or associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time data creates a critical shortfall in understanding the ecological impacts.

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

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

In summary, the absence of any assessment pertaining to dark skies and nocturnal wildlife signifies a considerable evidential gap. The lack 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 inadequate and does not address the economic and social repercussions for a vital sector of the Isle of Lewis economy. The region's tourism relies heavily on its wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. It is acknowledged that 86% of visitors are attracted by the scenic beauty; however, the application fails to provide a quantified analysis regarding how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of tourism.

Tourism on the Isle of Lewis has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. Nevertheless, the application does not explore how the anticipated industrialisation of the seascape and the potential degradation of environmental quality might affect the Tourism Gross Value Added or the broader economic resilience. In the absence of this critical analysis, it remains unclear whether the development would yield a net economic benefit or pose a threat to a sector that is both established and expanding.

Furthermore, the assessment neglects to recognise the crucial role that environmental quality plays in attracting tourists, particularly the significance of unspoiled landscapes and dark skies to the visitor experience, as well as the emerging markets of nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a considerable gap in understanding the implications for a recognized and growing segment of the local economy.

Given the context of an island community that suffers from limited economic diversification, the lack of an assessment on tourism impacts has broader consequences for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, especially concerning economic impact and the necessity of demonstrating net benefit. It contradicts strategic objectives that highlight

tourism as a key growth sector, while also lacking sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the deficiencies in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and recognising the island's economic dependency result in a significant evidential gap. This lack of comprehensive evaluation hinders a robust understanding of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm 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.

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: F8101D94

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References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with marine licensing and Environmental Impact Assessment procedures. A thorough review of the Environmental Impact Assessment Report and accompanying materials reveals significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west coast of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns arise regarding the compatibility of the project's scale, proximity, and design with statutory requirements, national policy, and sustainable development principles.

The application lacks a robust evidential basis necessary for a lawful determination. Essential environmental data is missing, baseline information is either limited or inconsistent, and crucial components of the proposal remain undefined. The adoption of a flexible design framework complicates the assessment of likely significant effects, and the reliance on unspecified mitigation measures hampers the evaluation of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive or informed perspective on the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by credible evidence.

There are evident and substantial conflicts with existing policies. The proposal is at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts are critical as they directly pertain to the statutory tests required for consent and challenge the ability of the competent authority to ascertain the development's acceptability from a policy standpoint.

The scale of this proposal is unprecedented for the area, with large turbines sited in close proximity to the shoreline, raising significant concerns about landscape capacity, visual impact, and environmental consequences. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy violations highlight that the application is incomplete and unable to facilitate a lawful determination. In light of these factors, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a complete, transparent, or dependable overview of the potential environmental effects linked to the proposal. The introduction of a flexible Project Design Envelope, which lacks commitment to definitive turbine sizes, layouts, or configurations, creates considerable uncertainty. This ambiguity compromises the integrity of the assessment, resulting in impacts that may not accurately represent the development that will ultimately be constructed. Consequently, both the public and the competent authority are unable to grasp the true magnitude of the environmental effects.

The application significantly depends on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under these conditions suggests that any environmental harm will be resolved at a later stage, which obstructs a meaningful evaluation of effectiveness and an assessment of residual impacts. This postponement of crucial information until after consent is granted is procedurally inappropriate and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigation measures must be clearly identified prior to determination.

Moreover, the application reveals substantial evidential shortcomings, such as gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These factors lead to uncertainty surrounding the scale and significance of impacts, especially where claims of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainty that is inconsistent with statutory requirements.

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

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

ASSESSMENT OF ALTERNATIVES

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

assessed, and chosen over more damaging ones.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment 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 application raises significant concerns regarding its reliability, primarily due to internal inconsistencies and methodological shortcomings. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already experiencing declines, yet the application does not convincingly demonstrate that these species will remain unaffected. Key foraging areas and migratory pathways are directly impacted by the proposed development, but the assessment fails to adequately evaluate crucial factors such as displacement, collision risk, and habitat loss.

There exists a fundamental contradiction within the application. The developer asserts that no significant adverse effects will occur, while simultaneously pursuing a Habitats Regulations derogation case, which is applicable only when significant harm is anticipated. This inconsistency raises doubts about the validity of the assessment and suggests that its conclusions lack adequate evidential support. Furthermore, the assessment does not sufficiently account for the seabirds associated with protected sites like the Lewis Peatlands and St Kilda, and the importance of these feeding

grounds remains underrepresented. The reliance on modelling approaches introduces uncertainty, particularly for vulnerable species such as Kittiwakes and Fulmars, as the methodologies employed are likely to underestimate mortality rates, especially when baseline data is lacking and behavioural responses are not fully understood.

The siting of turbines within a recognised migratory corridor presents another considerable risk, creating a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. Long-term implications of sustained mortality in this corridor are not thoroughly assessed, nor are the potential effects on species with relatively small global populations considered.

Regulatory standards demand that evidence demonstrates no adverse effect on the integrity of protected sites, yet this application does not meet the necessary evidential threshold. The presence of contradictory conclusions, coupled with data gaps and modelling deficiencies, prevents a lawful conclusion in support of consent and engages the precautionary principle. Additionally, these deficiencies represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These failings 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 assessment regarding cultural heritage and community identity is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts a narrow view, treating heritage as separate, static entities, rather than acknowledging their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming is evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices, yet are classified merely as static features in the assessment. This classification neglects their current use, meaning, and the implications of development on their surroundings. Such a mischaracterisation leads to an incomplete evaluation of cultural effects and overlooks their vital role in community life.

Additionally, the assessment does not adequately address intangible cultural heritage, including the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These factors are crucial to the area's identity but have been entirely disregarded, resulting in a significant oversight. Without

considering these elements, the cultural ramifications of the proposed development cannot be comprehensively understood.

Concerns also arise surrounding community rights and engagement. The Gaelic-speaking population is recognised as possessing a distinct cultural identity, akin to that of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement compromises the legitimacy of the assessment and fails to adhere to established principles regarding participation in decisions that influence cultural and environmental interests.

A serious procedural lapse is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority is unable to fulfil its legal 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 inadequacies place the proposal in direct conflict with National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect to consider both tangible and intangible heritage, as well as to acknowledge living cultural practices, signifies a clear deviation from policy requirements.

Overall, the failure to adequately 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 thoroughly examined, and the application does not provide a solid foundation for evaluating the genuine cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the complete Social Impact Assessment significantly undermines the ability to properly evaluate the social impacts, health, and wellbeing associated with the proposed development. Although the developer engaged local residents through focus groups and commissioned a Social Impact Assessment, the lack of transparency regarding the full report creates an evidential gap that hinders public understanding and the competent authority's ability to assess the social risks highlighted in the developer's research.

Available summaries reveal that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement rather than speculation, yet without access to the full assessment, proper scrutiny of the findings is unattainable. This limitation restricts the ability to ascertain the significance of these impacts in the decision-making process.

Moreover, there is clear evidence indicating that the proposal threatens community identity and cohesion, with references to "cultural loss" found within the developer's own documentation. However, these findings have not been adequately integrated into

the main application or given the weight they deserve. By withholding the complete Social Impact Assessment, the developer obscures the true human and social cost of the proposed development.

The lack of transparency also jeopardises the Environmental Impact Assessment process. Understanding the full range of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. The absence of the complete dataset means that the application does not provide 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. Development proposals must foster positive health outcomes and mitigate harm, yet the evidence at hand suggests existing negative effects that remain undisclosed. Without the full assessment, it is impossible to establish compliance with this policy framework.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a critical omission in the application and fails to satisfy the evidential criteria set forth by the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the complete Social Impact Assessment, coupled with the evidence of existing adverse impacts, renders the evaluation incomplete and unreliable. This situation prevents a lawful determination and reinforces the assertion that the application is not underpinned by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is lacking and does not reflect the extent of change or the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The proposed large-scale turbines near the shoreline would create a continuous industrial presence, fundamentally changing this character and leading to a permanent transformation of the landscape.

The application does not sufficiently represent the visual changes expected. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal spots. This would directly impact visual amenity and undermine the qualities of naturalness and remoteness. The assessment fails to convey the significance of this impact in a landscape so sensitive.

There are also concerns about how visual viewpoints were chosen and presented. Some viewpoints may not accurately reflect the most sensitive areas or worst-case scenarios, especially concerning key cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been understated, which

compromises the assessment's reliability.

Furthermore, there is a failure to assess the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape linked to the Atlantic horizon. The assessment treats these sites as separate instead of acknowledging their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are viewed and breaking their connection to the natural horizon. This signifies not only a visual impact but also a deeper cultural and spatial harm that has not been adequately addressed.

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the protection of natural places and historic assets. The extent of change is at odds with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any claims of policy adherence.

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

In summary, the assessment fails to accurately depict the scale of impact, the environment's sensitivity, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and strengthen the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves substantial seabed preparation and installation works in a high-energy Atlantic environment, yet the assessment of construction and pollution risks is incomplete. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application relies on mitigation and contingency measures that would be prepared after consent, which prevents any meaningful evaluation of their adequacy or effectiveness.

Given the sensitivity of the receiving environment, this reliance on undefined future measures is particularly concerning. The West Lewis coastline supports clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide sufficient detail on prevention, control, or monitoring measures.

Uncertainty regarding the scale and behaviour of sediment plumes from seabed

disturbance and cable installation further complicates the situation. Without robust modelling and clearly defined management strategies, it is impossible to determine the extent, duration, or ecological effects of these impacts. This uncertainty also extends to the potential effects on marine species and habitats identified as sensitive within the wider assessment.

The absence of detailed emergency response procedures exacerbates these issues. By deferring contingency planning to a post-consent stage, the application prevents an evaluation of whether appropriate safeguards are in place to respond to pollution events. This introduces procedural risk and undermines the authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards conflicts with the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation must be assessed before consent, and the lack of such information means 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 absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts make the assessment materially deficient. These shortcomings hinder a robust evaluation of construction and pollution risks and support the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application fails to adequately assess the impacts on fisheries and marine life, lacking a strong evaluation of both ecological and socio-economic consequences. The coastal waters off West Lewis are home to a vibrant marine ecosystem and a thriving fishing industry. However, the proposal does not show how these habitats and uses can be preserved without causing significant disruption.

A major concern is the assumption that fishing activities can be moved without repercussions. The application does not provide any evidence that alternative fishing grounds are available or capable of supporting the increased pressure. This is a critical gap, as such displacement could lead to overfishing in other areas and have broader economic repercussions for the local fishing fleet. Without a solid, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Additionally, the proposal poses significant risks to marine species, particularly due to underwater noise generated during construction. Extended high-energy hammer piling may disturb species over large distances, affecting dolphins among others. The anticipated disturbance to a large portion of the local bottlenose dolphin population is concerning, yet the application minimizes these effects without sufficient evidence.

There is a notable inconsistency in the application, where the necessity for licenses to

allow harm to European Protected Species is acknowledged, yet impacts are described as negligible. This contradiction raises questions about the reliability of the assessment and compliance with the Habitats Regulations, especially regarding anticipated harm that may require legal authorization.

Moreover, the application does not take into account cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A thorough evaluation of these combined effects is essential to understand the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not 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 impacts on marine biodiversity, making it impossible to conclude that this proposal constitutes sustainable development.

In summary, the lack of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the inconsistencies within the application contribute to an incomplete and unreliable assessment. These shortcomings hinder a proper evaluation of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is incomplete and does not fully consider the impacts of what is a single integrated project. The offshore turbines and onshore works are inherently connected but are evaluated separately. This separation leads to a fragmented approach, obscuring the overall environmental and socio-economic effects.

Onshore components consist of cabling through protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure across sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and ecologically delicate habitat. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the project's environmental footprint.

By excluding or postponing the assessment of onshore impacts, the application prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all parts of a project must be considered together. However, the division between offshore and onshore elements results in a lack of understanding of the combined impacts on peatlands, habitats, and communities.

There are significant risks to sensitive habitats, including machair systems and peatland environments, which enjoy policy protection. The application does not adequately demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures are in place. This creates an evident gap in biodiversity protection.

The proposal also raises issues regarding carbon balance. Disturbing peatland releases stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this matter or show that the overall carbon balance is beneficial.

Additionally, routing the infrastructure through active croft land may conflict with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, casting doubt on its deliverability and legal compliance.

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

Overall, the separation of project components, lack of a comprehensive assessment, and absence of evidence regarding environmental and land use impacts result in this portion of the application being incomplete and unreliable, thereby obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife represents a significant oversight within the Environmental Impact Assessment, with implications for both ecological integrity and community experience. The coastline of West Lewis is noted for its exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism, particularly in emerging sectors like astro-tourism. The proposed introduction of permanent red aviation lighting, which is visible over long distances, would create a persistent and disruptive "wall of light" across the western horizon, fundamentally altering the night-time atmosphere.

Moreover, the application fails to evaluate the visual amenity, landscape character, or the experiences of residents and visitors as influenced by this lighting. Given the crucial role that dark skies play in the identity of the area, this oversight is particularly significant. The Environmental Impact Assessment does not include a lighting impact assessment or a phototaxis study, neglecting to address the potential effects of aviation lighting on nocturnal wildlife, including species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel. These species are notably sensitive to artificial lighting, which can lead to disorientation and an increased risk of collisions.

This lack of evaluation extends to the reliance on daytime survey data within the ornithological assessment, which fails to capture the nocturnal behaviours and associated risks of species like Kittiwakes, which may forage or migrate at night. Consequently, the absence of site-specific night-time data creates a critical void in understanding the ecological consequences of the proposed development.

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

From a policy standpoint, this omission is at odds with National Planning Framework 4 regarding the protection of natural environments and overall environmental quality. Furthermore, it detracts from the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is a vital component of the ecosystem.

In summary, the lack of an assessment of dark skies and nocturnal wildlife reveals a significant evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and incapable of supporting a lawful determination.

TOURISM

The tourism sector on the Isle of Lewis is crucial to the local economy, having seen substantial growth from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application lacks a thorough assessment of tourism impacts, failing to evaluate how large-scale offshore infrastructure would affect visitor numbers, behaviour, and overall economic contribution, despite acknowledging that 86% of visitors are attracted by the area's scenery.

Furthermore, the assessment does not consider how the industrialisation of the seascape and a potential decline in environmental quality could influence Tourism Gross Value Added or the economic resilience of the community. Without this analysis, it remains unclear whether the proposed development would provide a net economic benefit or jeopardise a vital and growing sector.

The report also overlooks the importance of environmental quality in enhancing the visitor experience, neglecting factors such as unspoiled landscapes and dark skies, which are essential to nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment further highlights the deficiencies in the evaluation, leaving a considerable gap in understanding its impact on a recognised and expanding segment of the local economy.

In a context where the island community has limited economic diversification, the lack of assessment regarding tourism impacts poses significant risks for employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities, as required under the Islands (Scotland) Act 2018, have not been addressed.

From a policy standpoint, the application fails to demonstrate compliance with

National Planning Framework 4, particularly concerning the economic impact and the necessity to show net benefit. It contradicts strategic objectives that recognise tourism as a priority growth sector and does not furnish adequate evidence for the competent authority to evaluate the economic ramifications of the proposal.

The cumulative failure to quantify tourism impacts, analyse environmental factors that drive visitor behaviour, and acknowledge the island's economic dependency results in a substantial evidential gap. This inhibits a robust assessment of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is deeply concerning and should be refused in its entirety. It demonstrates significant deficiencies that make it unfit for determination. There are critical gaps in baseline data, which undermine the reliability of the evidence presented. The proposal relies on an undefined design envelope and mitigation measures that are unspecified, while also omitting key impact pathways such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism effects. As a result, the Environmental Impact Assessment lacks completeness and fails to provide a comprehensive understanding of the likely significant effects and residual impacts.

Additionally, procedural failures are evident throughout the application. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as outlined in the Islands (Scotland) Act 2018. Furthermore, the failure to disclose a full Social Impact Assessment is a material omission that prevents a thorough evaluation of the impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings render the application insufficient for a competent authority to assess.

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

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent within themselves. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been met. This situation calls for the application of the precautionary principle, which prevents a lawful conclusion that the impacts are acceptable.

Moreover, the proposal threatens 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 would lead to permanent effects that cannot be adequately mitigated.

In summary, the combination of information deficiencies, policy conflicts, and unresolved environmental risks indicates that the application is both procedurally and substantively unfit for determination. The competent authority must refuse consent based on these grounds or invoke the necessary regulatory provisions to require 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: 5C65D714

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted in accordance with the marine licensing and Environmental Impact Assessment regimes. A comprehensive review of the Environmental Impact Assessment Report and associated documentation reveals significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

Concerns arise primarily due to the unprecedented scale and design of the proposal, which raises questions about its compatibility with statutory requirements, national policy, and sustainable development principles. The application does not establish a sufficient evidential basis for a lawful determination. Critical environmental data is lacking, baseline information is inconsistent and limited, and several key aspects of the proposal remain undefined. The flexible design framework employed does not facilitate a clear assessment of likely significant effects, and the reliance on unspecified mitigation measures renders the evaluation of their effectiveness impossible. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to the absence of robust supporting evidence.

Moreover, there are evident and substantive conflicts with established policies. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural landscapes, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements for the protection of biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and impair the competent authority's ability to determine the proposal's acceptability in policy terms.

The proximity of large turbines to the shoreline introduces significant concerns regarding landscape capacity, visual dominance, and environmental impact. In light of the absence of adequate information, dependence on undefined mitigation strategies, evidential inadequacies, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. Thus, the application must invoke the precautionary principle.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is incomplete and fails to provide a clear, reliable account of the potential environmental effects of the proposal. The absence of fixed turbine dimensions, layouts, or configurations due to the flexible Project Design Envelope creates significant uncertainty. This lack of commitment undermines the assessment's integrity and prevents both the public and the competent authority from grasping the actual extent of the environmental effects, as the impacts presented may not accurately reflect the development that will ultimately be constructed.

Moreover, the application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent with the understanding that environmental harm will be addressed later does not allow for a meaningful evaluation of effectiveness or the assessment of residual impacts. This deferral of critical information to post-consent stages is procedurally inappropriate and contradicts the Environmental Impact Assessment regime's purpose, which necessitates a clear establishment of likely significant effects and mitigation prior to determination.

Additionally, the report suffers from substantial evidential deficiencies, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These issues lead to uncertainty about the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are drawn 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 does not meet the evidential threshold needed under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This necessitates the application of the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it cannot be evidenced that impacts have been fully assessed or that appropriate safeguards are in place.

In conclusion, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and thorough assessment of environmental effects and mean that the competent authority cannot make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposal presents significant shortcomings in its assessment of alternatives, failing to meet the necessary standards set by the Environmental Impact Assessment regime. The application does not offer a coherent or evidence-based evaluation of realistic alternatives, neglecting to provide a structured comparison based on environmental impacts. Instead, it merely recounts the evolution of the project, which does not

adequately demonstrate that less harmful options have been properly identified, assessed, and favoured over more damaging solutions.

Moreover, there is a troubling lack of transparent analysis regarding alternative offshore locations, development scales, or design configurations. The application does not convincingly establish that the developer has considered the possibility of siting turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be less severe. Given the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impacts, the absence of such an analysis prevents any conclusion that the chosen siting is the least damaging option available.

This inadequacy extends to the assessment of cable routing and landfall, where there is a lack of evidence demonstrating that alternative routes have been thoroughly explored to reduce impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The failure to outline a clear avoidance strategy or conduct a comparative analysis suggests that the application has not adopted mitigation by design, instead relying on post-design measures that may not sufficiently address potential harm.

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

From a policy standpoint, these deficiencies undermine compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a systematic and comparative assessment is a significant omission that leads to the overall conclusion that the application has not been adequately evaluated, 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, containing significant gaps in evidence and inconsistencies that undermine its conclusions. This raises serious concerns, particularly given that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. The application fails to meet the necessary evidential standard to demonstrate that these species will not be adversely affected. It is located within key foraging areas and migratory pathways, yet the assessment does not adequately evaluate the risks associated with displacement, collision, or habitat loss.

Moreover, a critical contradiction is present within the application itself. The developer asserts that there will be no significant adverse effects, while also pursuing a Habitats Regulations derogation case, which is only applicable when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and highlights that the conclusions drawn are not substantiated by the evidence provided.

Insufficient evidence is presented regarding the impact on seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not fully recognised, and the reliance on modelling approaches injects uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. There is a strong likelihood that the methodologies employed underestimate mortality, especially given that baseline data is lacking and behavioural responses remain poorly understood.

The proposed siting of turbines within a known migratory corridor introduces an additional risk, creating a barrier in a primary flight path used by birds migrating between the United Kingdom and Iceland. The long-term consequences of sustained mortality in this corridor, as well as the potential effects on species with small global populations, are not adequately assessed in the application.

From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data deficiencies, and limitations in the modelling means that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and precludes a lawful conclusion in support of consent. The deficiencies identified also represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment 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.

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 application lacks crucial detail necessary for a comprehensive understanding of the environmental risks associated with construction and pollution. Significant seabed preparation and installation activities are proposed within a challenging high-energy Atlantic environment; however, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans presented. Instead, the application relies on unspecified mitigation and contingency measures that would be

prepared only after consent is granted, which severely limits the ability to assess their adequacy or effectiveness at this stage.

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

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

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

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

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application fails to provide a sufficient assessment of fisheries and marine life, leaving critical ecological and socio-economic impacts unexamined. It does not demonstrate that these habitats and uses can be protected or maintained without significant disruption.

A primary concern is the flawed assumption that fishing activity can be displaced without consequences. The application lacks evidence that alternative fishing grounds

are available, accessible, or capable of handling increased pressure. This significant omission raises the risk of overfishing in other areas and could have wider economic repercussions for the local fishing fleet. The implications for fisheries and livelihoods cannot be properly assessed without a clear and evidence-based approach.

Furthermore, the proposal poses considerable risks to marine species, particularly due to underwater noise during construction. The use of high-energy hammer piling over an extended duration is likely to disturb marine life across large distances, notably impacting species such as dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population is concerning, yet the application downplays these effects without adequate evidence.

There is a clear inconsistency within the application, as it acknowledges the need for licences to permit harm to European Protected Species while simultaneously describing those impacts as negligible. This contradiction 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 address cumulative impacts arising from various pressures, such as habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, it remains impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal lacks a comprehensive evaluation of dark skies and nocturnal wildlife, resulting in a significant omission within the Environmental Impact Assessment. The West Lewis coastline is known for its remarkably dark skies, which are vital to the area's environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting, visible from great distances, would create a continuous "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

There is no analysis of how this lighting may impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the significance of dark skies to the region's identity and the potential for emerging sectors like astro-tourism. The failure to account for these impacts results in a clear gap in the overall landscape and environmental assessment.

Moreover, the application neglects to evaluate the potential consequences for nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting due to their phototactic response, which can cause disorientation and increase collision risks. The absence of any lighting impact assessment or phototaxis study means that there has been no evaluation of how the proposed aviation lighting may affect these species or elevate mortality rates.

This issue is exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activity and related risks. Kittiwakes, for instance, may forage or migrate at night and are also at risk of disorientation from artificial lighting, a risk that has gone unassessed. The lack of site-specific night-time data creates a serious shortfall in understanding the ecological impacts of the proposal.

Without an assessment of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites might be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be met, which invokes the precautionary principle and hinders a lawful determination.

From a policy standpoint, the omission contravenes National Planning Framework 4 concerning the protection of natural places and environmental quality. Furthermore, it undermines the overall assessment of landscape and seascape impacts, as the character of the night-time environment is a crucial aspect of the ecosystem.

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

TOURISM

The evaluation of tourism impacts is severely lacking and does not adequately address the economic and social ramifications for a vital sector of the Isle of Lewis economy. The viability of tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and the feeling of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure may influence visitor numbers, behaviours, or the overall economic contributions from tourism.

Significantly, tourism has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting over 1,000 jobs and constituting up to 16% of the island's economy. However, the application does not simulate how the potential industrialisation of the seascape and degradation of environmental quality could affect Tourism Gross Value Added or broader economic resilience. Without this analysis, it remains impossible to ascertain whether the proposed development would yield a net

economic benefit or jeopardise a flourishing sector.

Additionally, the assessment neglects the critical role environmental quality plays in enhancing tourism, including the significance of unspoilt landscapes and dark skies for visitor experiences and the burgeoning markets of nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, creating a considerable gap in understanding the impacts on an acknowledged and expanding segment of the local economy.

In a context where the island community has limited economic diversification, the oversight in assessing tourism impacts presents broader risks for employment, local enterprises, and the sustainability of the community. The absence of a thorough Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately evaluated, as mandated under the Islands (Scotland) Act 2018.

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

In summary, the collective failure to quantify tourism impacts, analyse environmental influences on visitor behaviour, and account for the island's economic dependencies leads to a significant evidential void. This gap hinders a thorough assessment of the economic effects and underscores the conclusion that the application is inadequate.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the criteria of sustainable development, as it does not align with statutory duties, national policy, or evidential standards. This application echoes the primary concerns that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. It is presented now under a policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing, yet fails to address these critical areas effectively.

Significant gaps exist in the evidential basis necessary for informed determination. The application lacks comprehensive baseline data and continues to utilise an undefined design envelope. Furthermore, it relies on unspecified mitigation measures and neglects to address key impact pathways such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete, failing to provide a full understanding of potential significant effects or residual impacts.

Moreover, there are evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the

Islands (Scotland) Act 2018. The omission of a full Social Impact Assessment further highlights material deficiencies that hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal stands in direct opposition to the National Planning Framework 4, as it does not demonstrate 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. Additionally, the cumulative impacts of offshore and onshore components have not been adequately assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and could be significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals remain incomplete and, in certain areas, inconsistent. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The significant deficiencies in information, along with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. It is imperative for the competent authority to either refuse consent on these grounds or to invoke the necessary regulatory provisions to mandate the submission of the outstanding information.

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

Additional Comments

The wild coast off the Isle of Lewis is a place of outstanding natural beauty. By installing these huge turbines so close to the shore would have a massive impact on the environment and marine life. These turbines would dominate the skyline for populated local areas which would have a huge impact on people living in the local communities.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 6DE27FE2

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its supporting documentation reveals significant planning, environmental, cultural, and procedural deficiencies. The development is proposed 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 arise from the scale, proximity, and design of the project, challenging its compatibility with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient 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 its impact. The use of a flexible design framework obscures likely significant effects, while unspecified mitigation measures prevent assessment of their effectiveness. Consequently, the documentation does not facilitate a fully informed understanding of the environmental, cultural, or community impacts, and the assertion of negligible or non-significant effects lacks robust evidence.

Substantive policy conflicts are evident. The proposal appears to contradict 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 necessary for consent and jeopardise the ability of the competent authority to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposal, with large turbines situated near the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of inadequate information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate, failing to deliver a comprehensive, transparent, and dependable evaluation of the environmental

repercussions 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 obstructs the consistent application of a worst-case scenario, thereby compromising the assessment's integrity. As a result, the environmental impacts detailed may not accurately reflect the eventual development, leaving both the public and the competent authority unable to grasp the true magnitude of environmental effects.

Furthermore, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have yet to be clearly defined. Seeking consent based on the premise that any environmental harm will be addressed at a later stage is unacceptable. This approach undermines the meaningful evaluation of effectiveness and the assessment of residual impacts. Deferring crucial information to post-consent stages conflicts with the objectives of the Environmental Impact Assessment regime, which stipulates that likely significant effects and mitigation strategies must be clearly established prior to decision-making.

There are significant evidential shortcomings present, including gaps in baseline data, limitations within the methodology, and an overreliance on assumptions rather than site-specific evidence. These issues result in uncertainty concerning the scale and significance of impacts, especially where the report presents conclusions of negligible or non-significant effects without adequate supporting data. The lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts, fostering scientific uncertainty that cannot align with statutory requirements.

Consequently, the application fails to meet the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This raises the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal also does not demonstrate adherence to National Planning Framework 4, specifically regarding biodiversity protection and environmental integrity, as it cannot confirm that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and significant gaps in baseline data renders the Environmental Impact Assessment Report untrustworthy and incomplete. These deficiencies prevent a lawful and thorough evaluation of environmental effects, leaving the competent authority unable to make a determination based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a comprehensive assessment of alternatives, which is essential under the Environmental Impact Assessment regime. Instead of delivering a structured and reasoned comparison of realistic alternatives based on their environmental consequences, the submission opts for a narrative that describes the project's evolution. This method does not adequately demonstrate that less harmful

options have been thoroughly identified, assessed, and selected over more damaging alternatives.

There is a notable lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has genuinely considered positioning turbines further offshore, where potential visual, ecological, and coastal impacts would likely be diminished. The sensitivity of the West Lewis coastline and the critical nature of proximity to shore in evaluating impact highlight the significance of this oversight. The absence of such analysis obstructs any determination that the proposed siting is the least damaging option available.

Moreover, the deficiencies extend to the assessment of cable routing and landfall, where the evidence is insufficient to confirm that alternative routes have been adequately explored to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The failure to present a clear strategy for avoidance, coupled with the lack of comparative analysis, indicates that mitigation by design has not been effectively applied; rather, reliance has been placed on mitigation measures that occur post-design.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This signifies a failure to adhere to the established mitigation hierarchy, thereby obstructing the competent authority's ability to ascertain whether less harmful and more suitable alternatives exist. Without a rigorous alternatives assessment, it is not feasible to conclude that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a material omission that leads to the overall conclusion that the application has not been sufficiently evaluated and therefore cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is significantly flawed and does not provide a thorough understanding of the ecological receptors involved. This marine system is biologically active and sensitive, yet the baseline data presented is incomplete, and the methodologies used fail to accurately capture the presence, behaviour, and habitat utilisation of various species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

One major oversight pertains to otters, a European Protected Species. The application does not sufficiently acknowledge their active use of coastal areas for foraging and

movement. The assessment neglects to consider their core foraging ranges and behavioural patterns, which means the possible effects of construction disturbances, noise, and heightened activity have not been properly evaluated. This lack of attention undermines the findings concerning the absence of significant effects on this species.

Similarly, the assessment of basking sharks suffers from notable deficiencies, as it relies heavily on aerial surveys that introduce considerable detection bias, especially under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, particularly when compared to established land-based observations that indicate frequent usage of these waters. The failure to incorporate or adequately consider such data leads to an incomplete baseline, further diminishing the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects that are based on assumptions rather than sound evidence. The insufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty concerning the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime or National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced prevents the exclusion of adverse effects beyond a reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these conditions, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The 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 presented fails to adequately recognise the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. The application adopts a simplistic view, treating heritage merely as a collection of isolated, static entities instead of acknowledging their continuous social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the handling of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practices, yet the assessment categorises them as static features, neglecting their ongoing significance and the repercussions of development on their surroundings. This misrepresentation leads to an inadequate evaluation of cultural effects and overlooks their integral role in community life.

Moreover, the assessment neglects to evaluate intangible cultural heritage, such as the Gaelic language, traditions, and the enduring connection between the community and its coastal environment. These aspects are vital to the area's identity, yet they are entirely omitted from the assessment, representing a major gap. Without addressing these elements, the potential cultural impact of the proposed development cannot be fully comprehended.

There are also pressing issues surrounding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity with attributes recognised as characteristic of Indigenous Peoples, but there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and fails to align with established principles of participation concerning decisions that affect cultural and environmental interests.

A crucial procedural oversight is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. In the absence of this assessment, the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic effects on the island community. This oversight alone hinders a lawful determination.

From a policy standpoint, these shortcomings put the proposal at odds with National Planning Framework 4, especially regarding the protection of historical assets and places. The inability to consider both tangible and intangible heritage, alongside the neglect of living cultural practices, constitutes a clear deviation from policy obligations.

When taken as a whole, the neglect to assess living heritage, intangible cultural values, community rights, and adherence to statutory requirements creates a substantial evidential void. The cultural impacts of the proposed development remain unassessed, and the application fails to offer a sufficient foundation for determining the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is deeply concerning and poses significant risks to our community's health, wellbeing, and identity. While the developer engaged local residents through focus groups, the failure to publish the complete report creates a substantial evidential gap. This absence not only limits public understanding but also hampers the competent authority's ability to gauge the full spectrum of social risks identified in the developer's own research.

Residents are already feeling the weight of this proposal, experiencing measurable stress, anxiety, and concern due to its scale and proximity. These effects are grounded in direct engagement, thereby reinforcing their legitimacy. Yet, without access to the full assessment, the findings remain shrouded in ambiguity, obstructing proper scrutiny and the evaluation of their significance in the decision-making process.

Moreover, there is clear evidence that this proposal is perceived as a threat to community identity and cohesion, with concerns about "cultural loss" arising from the developer's findings. Unfortunately, these critical impacts have not been adequately integrated into the main application nor afforded the necessary weight in the evaluation process. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This deficiency in transparency undermines the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude. The decision-making process requires a complete evidential basis to assess the balance between the benefits and potential harms of the proposal.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm, yet the evidence suggests existing adverse effects that have not been fully disclosed. Consequently, the absence of the full assessment makes it impossible to demonstrate compliance with this policy.

The implications of this omission are significant. The competent authority is unable to conduct a robust socio-economic and health evaluation without the full Social Impact Assessment. This represents a material flaw in the application and signifies a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

Taken together, the non-disclosure of the complete Social Impact Assessment, alongside evidence of existing adverse impacts, leaves the evaluation incomplete and unreliable. This ultimately undermines the lawful determination of the application, highlighting that it lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application for large-scale turbines near the West Lewis coastline raises serious concerns about the assessment of seascape, landscape, and visual impacts. The coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a strong sense of remoteness. The introduction of these turbines would create a dominant industrial presence, fundamentally changing the landscape and leading to a permanent transformation.

The assessment of visual change is insufficient. The scale and closeness of the turbines would dominate views from residential areas, historic sites, and popular coastal spots. This would directly impact visual amenity and diminish the qualities of naturalness and remoteness. Furthermore, the assessment does not adequately communicate the significance of these impacts, particularly in relation to the sensitive nature of the landscape.

Methodological issues have also been identified regarding the selection and presentation of visual viewpoints. There is evidence suggesting that the chosen

viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially concerning important cultural heritage sites and valued landscapes. This risk of underestimating visual impact raises questions about the assessment's reliability.

Another significant concern is the lack of consideration for the interconnectedness of landscape, seascape, and cultural heritage. Key sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape that visually and spatially connects to the Atlantic horizon. Treating these assets as isolated overlooks their interdependence and leads to an incomplete understanding of how the proposed development would affect their context and cultural importance.

The potential industrialisation of the seascape threatens to sever these connections, altering how heritage assets are perceived and disrupting their relationship with the natural horizon. This represents a deeper cultural and spatial harm that the application fails to adequately address.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly regarding the protection of natural spaces and historic assets. The extent of the proposed changes contradicts the need to maintain landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further diminishes any claim of compliance with policy.

It is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would create an unavoidable dominance. Therefore, the resulting changes are fundamental and permanent, not reducible to acceptable levels through mitigation efforts.

Overall, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation, reinforcing the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant risks to the sensitive West Lewis coastline, which is home to clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. The assessment of construction and pollution risks is notably incomplete, lacking the necessary detail to evaluate potential environmental effects. The application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans, instead depending on mitigation and contingency measures that are to be prepared after consent has been granted. This reliance on undefined future measures raises considerable concerns, especially given the delicate nature of the receiving environment.

The application acknowledges various risks, including sediment mobilisation and the potential for accidental chemical or oil spills. However, it fails to provide adequate

information on the strategies that will be implemented to prevent, control, or monitor these risks. Furthermore, there is considerable uncertainty regarding the scale and behaviour of sediment plumes that may arise from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of such disturbances, which could adversely affect marine species and habitats that have already been identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures only exacerbates these issues. By postponing contingency planning to a post-consent phase, the proposal undermines the ability to assess whether appropriate safeguards are in place for responding to pollution events. This creates procedural risks and hinders the competent authority's capacity to evaluate environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation need to be thoroughly assessed prior to consent; when such information is absent, a lawful determination cannot be reached. Additionally, the application does not demonstrate compliance with the policy requirements regarding environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application falls short in providing a thorough assessment of fisheries and marine life, leaving significant concerns regarding ecological and socio-economic impacts unaddressed. The waters off the West Lewis coast host a diverse marine ecosystem and an active fishing industry, yet the proposal fails to ensure that these vital uses and habitats can be safeguarded without considerable disruption.

One major concern is the assumption that fishing activities can be relocated without repercussions. The application lacks evidence to support the availability and accessibility of alternative fishing grounds that could withstand additional pressure. This oversight is critical, as displacement poses a risk of overfishing in other areas, which may result in broader economic implications for the local fishing fleet. Without an evidence-based evaluation, understanding the effects on fisheries and livelihoods is impossible.

The proposal also raises significant risks to marine species, particularly due to the underwater noise generated during construction. Prolonged high-energy hammer piling is anticipated to disturb marine life across extensive areas, impacting species such as dolphins. The expected disturbance to a notable proportion of the local bottlenose

dolphin population is alarming, yet the application minimises the importance of these effects without adequate supporting evidence.

There is a notable inconsistency within the application; while it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes the impacts as negligible. This contradiction questions the credibility of the assessment and suggests potential non-compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Moreover, the assessment neglects to evaluate cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A thorough examination of these combined effects is necessary to determine the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is significantly lacking and does not fully account for the impacts resulting from what constitutes a single integrated project. The offshore turbines and onshore works are interconnected; however, they are evaluated separately. This fragmented approach obscures the true magnitude of environmental and socio-economic effects.

The onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure that traverses sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. Without a thorough assessment of these impacts, the application fails to provide a complete understanding of the project's environmental footprint.

By not including or delaying the assessment of onshore impacts, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; yet, the distinct treatment of offshore and onshore elements obscures the combined impacts on peatlands, habitats, and communities.

Additionally, there are considerable risks to sensitive habitats, such as machair

systems and peatland environments, which are under policy protection. The application does not sufficiently demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been considered. This creates a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance, as the disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy development. The application inadequately addresses this matter or illustrates that the overall carbon balance is indeed advantageous.

Furthermore, routing infrastructure through active croft land poses potential conflicts with established land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, which raises issues regarding the feasibility and lawful execution of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of evaluation regarding dark skies and nocturnal wildlife represents a substantial gap within the Environmental Impact Assessment. The proposal is set to introduce permanent red aviation lighting that would produce a "wall of light" effect visible over extensive distances along the West Lewis coastline, which is known for its exceptionally dark skies. This alteration would not only impact the night-time environment but would also detract from the environmental quality, cultural identity, and tourism value of the area.

Furthermore, the assessment fails to consider how this lighting would affect visual amenity, landscape character, and the experiences of residents and visitors. Such omissions are particularly pertinent given the significance of dark skies for the area's identity and the burgeoning tourism sector focusing on astro-tourism. Consequently, the absence of these considerations creates a notable deficiency in the overall environmental and landscape assessment.

Equally alarming is the lack of an impact assessment on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit sensitivity to artificial lighting, potentially leading to disorientation and an elevated risk of collision. The application does not provide a lighting impact assessment or a study on phototaxis, failing to consider how the proposed aviation lighting might influence

these species or contribute to increased mortality.

This oversight is further exacerbated by the use of daytime survey data in the ornithological assessment, which does not account for nocturnal behaviour or associated hazards. For instance, Kittiwakes, which may forage or migrate during the night, are susceptible to disorientation from artificial lighting; however, this risk has not been adequately evaluated. The lack of site-specific data concerning night-time activity results in a critical shortcoming in understanding the ecological impacts.

In the absence of nocturnal impact assessments, it remains impossible to ascertain whether protected species or designated sites would face adverse effects. The requisite evidential standard needed to exclude such effects beyond reasonable scientific doubt cannot be satisfied, necessitating the application of the precautionary principle and thereby preventing a lawful determination.

From a policy standpoint, the failures in the assessment conflict with National Planning Framework 4, which mandates the protection of natural places and environmental quality. This lack of assessment also diminishes the overall evaluation of landscape and seascape impacts, as the character of night-time settings is integral to the environment.

In summary, the complete absence of evaluation regarding dark skies and nocturnal wildlife constitutes a significant evidential gap. The shortcomings in baseline data, impact modelling, and species-specific analysis leave the application incomplete and incapable of supporting a lawful determination.

TOURISM

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

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

In light of the island community's limited economic diversification, the failure to assess impacts on tourism carries broader implications for employment, local businesses,

and community sustainability. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated in accordance with the requirements set out in the Islands (Scotland) Act 2018.

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

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm presents serious issues regarding its compliance with sustainable development standards, statutory duties, and national policy. It mirrors the fundamental problems that led to the refusal of the Lewis Wind Power proposal in 2008, particularly concerning the unacceptable scale of industrialisation. This current proposal emerges within a stronger policy context that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it fails to adequately address these critical areas.

Significant deficiencies in the application prevent a comprehensive evaluation. It lacks a complete and reliable evidential foundation, with notable gaps in baseline data, an undefined design envelope, unspecified mitigation measures, and overlooked impact pathways such as nocturnal wildlife, onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment remains incomplete, failing to provide insight into likely significant effects or residual impacts.

Furthermore, procedural inadequacies are evident. The lack of a compliant Island Communities Impact Assessment violates statutory obligations under the Islands (Scotland) Act 2018, and the omission of a full Social Impact Assessment is a critical flaw. 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 directly contradicts the National Planning Framework 4, which necessitates the protection of biodiversity, natural places, and cultural heritage. It does not adequately demonstrate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit due to the absence of tourism impact modelling. Moreover, the cumulative impacts of both offshore and onshore components have not been thoroughly assessed, leaving uncertainties regarding effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain significant and uncertain. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, contradictory. The evidential standard needed to rule out adverse effects beyond reasonable scientific doubt has not been achieved, necessitating a precautionary approach that prevents a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks inhibits a lawful, 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 am very saddened by the want to construct wind turbines in what seems all of Scotland's rural areas in order to produce electricity for other areas of the UK and further a field. We live in a beautiful part of the world and there are other forms of renewables that can be used to create electricity which wouldn't cause any where near the same destruction, namely, hydro. To my knowledge, none of this has been taken into consideration.

Having lived in South Lanarkshire where we were surrounded by turbines, I have personal experience of the destruction to our lands, destruction of our roads to widen them to allow the turbines to be brought in, the flicker effect which can be extremely dangerous when you are driving on a motorway. The bank of red lights at night, which are very unnerving, but the biggest problem is that they are switched off because it is too windy causing huge amounts of money to be paid out. Money that, we, as the consumers, have to pay!

It is an outrage that we are subjected to these huge turbines blighting our landscape, destroying our seabeds, killing our wildlife (never to return) and NEVER being asked if we want it. There should be a public enquiry to find the opinion of the local people, there should be studies of alternative types of renewables that can be used in the area....the one thing Scotland has, is an abundance of water. To my knowledge...neither of these studies have taken place.

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: E259618B

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is incomplete and fails to provide a clear and trustworthy account of the potential environmental effects of the proposal. The approach of using a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This lack of specificity undermines the assessment's reliability and means the impacts described may not accurately represent the final development, limiting the ability of the public and the competent authority to grasp the true environmental effects.

The application depends significantly on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under these conditions means that environmental harm will be addressed later, which hinders any genuine evaluation of effectiveness or assessment of remaining impacts. This deferral of critical information to post-consent stages is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies should be clearly outlined before determination.

Furthermore, there are notable evidential shortcomings, such as gaps in baseline data, methodological limitations, and reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially where negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information obscures the understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to meet statutory requirements.

As a result, the application does not satisfy the evidential threshold mandated by the Habitats Regulations, which requires the exclusion of adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal also does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it is not established that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the reliance on an unspecified design envelope, the absence of clearly defined mitigation measures, and gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These issues hinder a lawful and robust assessment of environmental effects and leave the competent authority unable to make a determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally inadequate, failing to offer a thorough and dependable understanding of the ecological receptors present in the West Lewis coastal environment. This region is a sensitive and biologically vibrant marine system, yet the methodologies used are insufficient to accurately capture species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a robust evidential basis for evaluating potential impacts.

A significant oversight pertains to otters, a European Protected Species, as the application does not adequately recognise or evaluate their active use of coastal areas for foraging and movement. The omission of critical information regarding their core foraging range and behavioural patterns leads to an inadequate assessment of the potential effects of construction disturbance, noise, and increased activity. This gap undermines any conclusions drawn about the absence of significant effects on this species.

Additionally, there are notable shortcomings in the assessment of basking sharks, where the reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate frequent utilisation of these waters. The failure to incorporate or adequately consider such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings lead to 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 engenders uncertainty regarding the actual scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been appropriately identified or assessed. The level of uncertainty introduced means that adverse effects cannot be excluded beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development raises significant concerns regarding its impact on the seabird populations along the west coast of the Isle of Lewis, an area that supports internationally important species already in decline. The ornithological assessment presented is fundamentally flawed, lacking sufficient evidence and containing internal inconsistencies that compromise its conclusions. It fails to adequately demonstrate, to the necessary evidential standard, that these species will not face adverse effects. Given that the site is located within critical foraging areas and migratory pathways, it is alarming that the assessment does not thoroughly evaluate the risks associated with displacement, collision, or habitat loss.

Moreover, a stark contradiction emerges within the application itself. The developer asserts there will be no significant adverse effects, yet simultaneously advances a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment, suggesting that the conclusions drawn are not supported by the evidence provided. The assessment also lacks adequate proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will not be impacted. The critical nature of these feeding grounds is insufficiently recognised, and the reliance on modelling techniques introduces further uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially where baseline data is lacking and behavioural responses remain poorly understood.

The placement of turbines within a designated migratory corridor poses an additional risk, effectively obstructing a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of continuous mortality within this corridor, nor does it consider the potential effects on species that have relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold needed to ascertain that protected sites will remain unaffected. The presence of contradictory findings, along with gaps in data and limitations in the modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, thereby rendering a lawful conclusion in support of consent unattainable.

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

In summary, the assessment is deemed unreliable due to inconsistencies within its findings, methodological flaws, and a lack of adequate evidence. These issues hinder a comprehensive evaluation of potential impacts and reinforce the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage along the West Lewis coastline is insufficient. It does not recognise this area as a living cultural landscape where the environment, language, tradition, and community are deeply intertwined. Instead, the application treats heritage as a collection of static assets, overlooking their social, cultural, and spiritual roles in the community.

Significant shortcomings are evident in the treatment of important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial sites and places of spiritual significance. However, the assessment mischaracterises them

as unchanging features, neglecting their ongoing use and the implications of development on their surroundings. This misrepresentation leads to an incomplete understanding of cultural impacts, ignoring their vital place in community life.

Moreover, the assessment does not address intangible cultural heritage, such as the Gaelic language and local traditions, which are essential to the area's identity. The lack of consideration for these elements represents a major gap in the assessment, making it impossible to fully grasp the cultural impact of the proposed development.

Concerns also arise regarding community rights and participation. The Gaelic-speaking community possesses a unique cultural identity akin to that of Indigenous Peoples. Despite this, the process of Free, Prior and Informed Consent has not been carried out. This lack of engagement undermines the assessment's validity and does not align with principles of participation concerning cultural and environmental matters.

Additionally, a significant procedural error is the absence of a compliant Island Communities Impact Assessment, which is required by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot adequately assess the social, cultural, and economic effects on the island community. This oversight alone renders the determination unlawful.

From a policy standpoint, these inadequacies contradict National Planning Framework 4, especially regarding the safeguarding of historic assets and places. The failure to evaluate both tangible and intangible heritage and to acknowledge living cultural practices signifies a clear deviation from required policies.

Overall, the lack of consideration for living heritage, intangible cultural significance, community rights, and statutory responsibilities leads to a critical evidential gap. The application does not sufficiently evaluate the cultural impacts of the development, failing to provide a reliable basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly lacking and does not sufficiently address the sensitivity of the environment or the scale of change. The coastline of West Lewis is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would result in a continuous and prominent industrial presence, fundamentally changing this character and leading to a permanent transformation of the landscape.

The application does not fully capture the extent of this visual alteration. Due to the scale and proximity of the turbines, they would dominate the views from residential areas, historic sites, and popular coastal locations. This would have a direct effect on visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment fails to adequately communicate the significance of this impact within the

context of such a sensitive landscape.

Methodological issues also arise from the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the risk that the actual visual impact has been underestimated, which undermines the credibility of the assessment.

Additionally, the assessment neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context, linked visually and spatially to the Atlantic horizon. Rather than acknowledging their interdependence, the assessment treats these as isolated features, resulting in an incomplete understanding of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the preservation of natural spaces and historic assets. The level of change proposed is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a robust worst-case assessment further undermines claims of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of the construction and pollution risks associated with the proposal is notably deficient, lacking the essential detail needed to evaluate the potential environmental impacts effectively. This project includes substantial seabed preparation and installation within a high-energy Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans in place. Instead, the application relies on vague mitigation and contingency measures that are intended to be developed after consent has been

granted, which hampers any meaningful assessment of their adequacy or effectiveness.

The reliance on unspecified future measures raises significant concerns, particularly in light of the sensitivity of the local environment. The West Lewis coastline is characterised by clean coastal waters and important habitats that are at risk from sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

Moreover, there is considerable uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. In the absence of robust modelling and well-defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to the potential effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application obstructs the evaluation of whether appropriate safeguards are established to address pollution events. This introduces procedural risks and undermines the ability of the competent authority to assess the necessary environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of vital environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and required mitigation measures must be evaluated prior to granting consent; without this information, a lawful determination cannot be reached. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The 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 assessment of the onshore infrastructure is incomplete and does not fully consider the impacts of what is a single integrated project. The offshore turbines are linked to the onshore works, yet they are evaluated separately. This fragmented approach obscures the full scale of environmental and socio-economic effects.

Onshore elements involve cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. Excavation in areas of deep peat, particularly within Barvas Moor, is a significant

concern as it is a carbon store and ecologically sensitive habitat. The application lacks a comprehensive assessment of these impacts, hindering the understanding of the project's overall environmental footprint.

By excluding or deferring the assessment of onshore impacts, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components are considered together. However, the separation of onshore and offshore elements means the combined impacts on peatlands, habitats, and communities remain unclear.

Additionally, there are significant risks to sensitive habitats, such as machair systems and peatland environments that are protected by policy. The application does not show that impacts on these habitats have been fully assessed or that appropriate avoidance measures have been taken. This indicates a gap in evidence regarding biodiversity protection.

Concerns also arise about carbon balance. Disturbing peatland releases stored carbon and could create a carbon debt, contradicting renewable energy development objectives. The application does not sufficiently address this issue or show that the overall carbon balance is beneficial.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline features exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism potential. However, the proposal introduces permanent red aviation lighting that will create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. This significant change has not been evaluated in the Environmental Impact Assessment, which fails to consider the effects of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. Such omissions are particularly concerning given the area's reliance on dark skies, especially for emerging tourism sectors like astro-tourism.

Moreover, the lack of evaluation regarding impacts on nocturnal wildlife is alarming. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can result in disorientation and a higher risk of collisions. The application does not provide a lighting impact assessment or a study of phototaxis, thus neglecting to address the potential effects of aviation lighting on these species and the risk of increased mortality.

Additionally, the ornithological assessment is primarily based on daytime survey data, failing to account for nocturnal activity and associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation caused by artificial lighting, but this risk has not been assessed either. The absence of site-specific night-time data leaves a critical gap in understanding the ecological impacts.

Without a thorough assessment of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites might be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt has not been met, invoking the precautionary principle and preventing a lawful determination. Furthermore, this omission contradicts National Planning Framework 4 regarding the protection of natural places and environmental quality, while also compromising the broader evaluation of landscape and seascape impacts, as the night-time character is a vital aspect of the environment.

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

TOURISM

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

The significance of tourism is evident in its substantial growth, with revenue increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Despite this positive trend, the application does not analyse how the potential industrialisation of the seascape and the resultant loss of environmental quality might affect Tourism Gross Value Added or broader economic resilience. Without such analysis, it is impossible to ascertain whether the proposed development would provide a net economic benefit or detract from a sector that is both established and expanding.

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

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm exhibits significant deficiencies that undermine its alignment with the principles of sustainable development as mandated by statutory obligations and national policies. The issues identified in this application echo those from the 2008 refusal of the Lewis Wind Power proposal, where the level of industrialisation was deemed unacceptable. This current proposal, however, is evaluated within a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A thorough examination reveals that the application lacks a reliable evidential foundation necessary for informed decision-making. There are notable gaps in baseline data, reliance on an undefined design envelope, and unspecified mitigation measures, alongside the exclusion of critical impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment remains incomplete, inhibiting an adequate understanding of potential significant effects or residual impacts.

Procedurally, there are also marked failings. The omission of a compliant Island Communities Impact Assessment constitutes a breach of the Islands (Scotland) Act 2018, while the failure to provide the complete Social Impact Assessment represents a

significant shortcoming. These oversights hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

Furthermore, the proposal stands in stark contradiction to National Planning Framework 4. It does not adequately demonstrate the safeguarding of biodiversity, natural environments, and cultural heritage, fails to justify acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to missing tourism impact analysis. The cumulative effects of both offshore and onshore components have not been sufficiently evaluated, obscuring the repercussions for peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially considerable. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are lacking and, at times, inconsistent. The required evidential standard to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the application of the precautionary principle and precluding a lawful assertion of acceptable impacts.

Moreover, the proposed development would cause significant and irreversible alterations to an extremely sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual relationships, and adverse effects on tourism represent enduring changes that cannot be adequately mitigated.

Collectively, these factors render the application both procedurally and substantively unfit for determination. The extensive information deficiencies, in conjunction with conflicts with policy and unresolved environmental risks, obstruct the possibility of a lawful, evidence-based decision. Therefore, the competent authority must either reject the application on these grounds or invoke the appropriate regulatory measures to mandate the submission of the outstanding information.

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

Additional Comments

N4 cannot be viewed in isolation, it is part of a massive industrialisation of the Western Isles. The environmental damage caused by this project is immeasurable. The island does not have the infrastructure to cope with the vast influx of workers and industry, be that NHS, suitability of roads, retained fire service and accommodation.

Environmental damage through light pollution, impact on marine life and wildlife will never recover. The amount of peat being removed for access roads will have an untold impact on carbon capture. The pylons, connector stations being built on peat creates a fire risk that a retained fire service would be stretched to cope with.

The Island at present has a growing tourism industry the selling point being unspoilt remote scenery, sea views and dark skies.. Vast wind turbine, pylons and connector

stations will ruin the scenery and cause light pollution and noise..

The culture and heritage of the island is already at risk due to the number of holiday homes on the island, the mass influx of workers will hasten the demise of the way of life on the 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: 9827A643

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 regimes. Concerns arise from a review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies in planning, environmental considerations, cultural impacts, and procedural integrity. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity.

The unprecedented scale of the proposal, with large turbines sited close to the shoreline, raises alarm over landscape capacity, visual impact, and broader environmental implications. The application does not provide a sound evidential basis for a lawful determination, as it lacks critical environmental data, and baseline information is both limited and inconsistent. Additionally, important aspects of the proposal remain undefined. The flexible design framework employed prevents a comprehensive understanding of potential significant effects, while unverified mitigation measures hinder the ability to evaluate their efficacy. Consequently, the supporting documents fail to facilitate a full understanding of the environmental, cultural, and community impacts, rendering claims of negligible or non-significant effects unsupported by solid evidence.

Moreover, the application presents clear conflicts with established policy. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The proposal does not prove that it can meet national requirements aimed at protecting 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's acceptability in policy terms.

In light of the lack of adequate information, reliance on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance, it is clear that the application is incomplete and fails to support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate and fails to deliver a complete, transparent, or trustworthy account of the probable environmental impacts of the proposal. The reliance on a flexible Project Design Envelope, which lacks

commitment to definitive turbine dimensions, layouts, or configurations, creates substantial uncertainty and obstructs the consistent application of a worst-case scenario. This weakens the integrity of the assessment, meaning that the impacts outlined may not accurately represent the development that will ultimately be constructed. Consequently, both the public and the competent authority are unable to comprehend the true scope of environmental effects.

Furthermore, the application places significant dependence on mitigation measures, monitoring strategies, and management plans that are not yet established. Seeking consent on the premise that environmental harm will be managed at a later stage impedes any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally unacceptable and contravenes the aims of the Environmental Impact Assessment regime, which necessitates the clear establishment of likely significant effects and mitigation prior to determination.

There are notable evidential shortcomings as well, including gaps in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. This results in ambiguity regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are presented without strong supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory demands.

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

Overall, the dependence on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies hinder a lawful and thorough assessment of environmental effects, leaving the competent authority incapable of making a determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents significant shortcomings in its assessment of marine ecology and protected species, leading to an inadequate understanding of the ecological receptors within the West Lewis coastal environment. This area, characterised by its biological activity, has been the subject of a baseline data collection that is notably incomplete, and the methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of various species. Consequently, the assessment

fails to establish a reliable evidential foundation for evaluating potential impacts.

Particularly concerning is the omission regarding otters, which are classified as a European Protected Species. The application does not adequately acknowledge their active foraging and movement within coastal areas. The lack of an assessment of their core foraging range and behavioural patterns means that the possible impacts from construction activities, including noise and increased human presence, have not been sufficiently examined. This lack of thoroughness undermines the validity of the claim that there would be no significant effects on this species.

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

These methodological shortcomings result in assertions of negligible or non-significant effects that are based more on assumptions than on solid evidence. The lack of comprehensive baseline data hampers the ability to carry out meaningful assessments of cumulative and indirect impacts, including those influenced by seasonal changes and broader ecosystem interactions. This introduces significant uncertainty about the actual risks faced by marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the requirements outlined by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed the protected species present. The uncertainty created by these deficiencies prevents a dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In this context, granting consent cannot be justified legally.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These limitations inhibit a thorough 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 proposal is fundamentally flawed, exhibiting substantial gaps in evidence and inconsistencies that undermine its conclusions. Key foraging areas and migratory pathways, particularly along the west coast of the Isle of Lewis, support internationally important seabird populations, many of which are already experiencing declines. However, the application fails to demonstrate, to the necessary evidential standard, that these species will not be adversely affected by the development. The implications of displacement, collision risk, and habitat loss have not been robustly evaluated.

There exists a significant contradiction within the application. The developer concludes that there are no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence presented.

Moreover, the assessment does not sufficiently demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is inadequately considered, and reliance on modelling approaches introduces uncertainty, especially for species in severe decline like Kittiwakes and Fulmars. The methodologies utilised are likely to underestimate mortality rates, particularly given the incomplete baseline data and a lack of comprehensive understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor presents additional significant risks, effectively creating a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not thoroughly assess the long-term implications of sustained mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application fails to meet the evidential threshold necessary to assert no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle, which precludes a lawful conclusion that would support consent.

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

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

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 is inadequate and does not sufficiently capture the extent of change or the sensitivity of the environment involved. The character of the West Lewis coastline is shaped by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines, positioned close to the shoreline, would establish an industrial presence that is continuous and dominant, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the application fails to represent the scale of visual change accurately. The size and proximity of the turbines would dominate 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 in the context of such a sensitive landscape has not been properly conveyed.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the viewpoints chosen may not adequately depict the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This deficiency introduces a risk that the magnitude of visual impact has been understated, thereby calling into question the reliability of the assessment.

Another significant shortcoming is the lack of evaluation of the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context, linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these heritage assets as isolated, failing to acknowledge their interdependence, which results in an incomplete understanding of the impacts on their settings and cultural significance.

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

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

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

In conclusion, the assessment inadequately represents the magnitude of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and bolster the argument that the proposal is incompatible with the protection of this valuable landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is lacking in detail necessary for evaluating potential 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 will be prepared after consent, which does not allow for a meaningful evaluation of their adequacy or effectiveness.

The West Lewis coastline features clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. This makes the reliance on undefined future measures particularly troubling. The application does acknowledge risks, such as sediment mobilisation and accidental chemical or oil spills, but it does not provide enough information on how these will be prevented, controlled, or monitored.

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

Compounding these issues is the absence of detailed emergency response procedures. By delaying contingency planning until after consent, the application hinders the ability to evaluate whether appropriate safeguards are established to manage pollution events. This introduces procedural risks and undermines the competent authority's capacity to assess environmental protection measures at the point of determination.

From a regulatory standpoint, deferring essential environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. It is necessary to assess likely significant effects and mitigation before consent. The lack of such information means that a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife constitutes a significant evidential gap within the Environmental Impact Assessment. The West Lewis coastline is noted for its exceptionally dark skies, which are integral to the region's environmental quality, cultural identity, and tourism appeal. The proposed

introduction of permanent red aviation lighting, which will be visible over substantial distances, is expected to create a continuous and intrusive "wall of light" across the western horizon, fundamentally altering the night-time environment.

There is a notable lack of analysis regarding the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly relevant given the significance of dark skies to the area's identity and the emerging tourism sector focused on astro-tourism. The failure to evaluate these impacts reveals a considerable gap in the comprehensive landscape and environmental assessment.

Additionally, there is no examination of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting, which can result in disorientation and heightened risks of collision. The application has not included any assessment related to lighting impacts or phototaxis studies, thereby neglecting to evaluate how aviation lighting may adversely affect these species or contribute to increased mortality rates.

This shortcoming is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to address nocturnal activity or associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this potential threat has not been evaluated. The lack of site-specific night-time data creates a critical void in understanding the ecological impacts involved.

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

From a policy perspective, this omission is at odds with National Planning Framework 4, which pertains to the safeguarding of natural places and the preservation of environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, given that night-time character is a vital aspect of the environment.

In conclusion, the complete lack of assessment regarding dark skies and nocturnal wildlife results in a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of supporting a lawful determination.

TOURISM

The assessment of tourism impacts presents significant deficiencies, failing to evaluate the economic and social implications for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. The application notes that 86% of visitors are attracted by

the scenery, yet it does not provide any quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contribution.

Tourism on the Isle of Lewis has experienced considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. Nevertheless, the application neglects to model how the potential industrialisation of the seascape and deterioration of environmental quality could impact Tourism Gross Value Added or the broader economic resilience of the island. The lack of such analysis raises concerns about whether the proposed development would yield a net economic benefit or detract from an established and thriving sector.

Furthermore, the assessment does not adequately consider the vital role of environmental quality in attracting tourists, overlooking the significance of unspoiled landscapes and dark skies for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment exacerbates this oversight, resulting in a substantial gap in understanding the impacts on a growing segment of the local economy. In a community with limited economic diversification, the failure to assess tourism impacts poses broader risks to employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities remain unaddressed, as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impact and the need to illustrate a net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for the competent authority to evaluate the economic consequences of the proposal. Overall, the lack of quantified tourism impacts, the inadequate assessment of environmental influences on visitor behaviour, and the disregard for the island's economic dependence culminate in a significant evidential gap. This hinders a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

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

I personally object due to the impact this project will have, and is already having, on my mental health. The developer admits that the health impacts of the visual changes are “potentially significant” and simply say that this is unavoidable due to the nature of the project. I, like many who live here, are highly sensitive to our environment. It has a direct

effect on my wellbeing. The unspoilt open and natural vistas are one of the main reasons I have made this my home. I would find the impacts from the wind farm quite unbearable. Even the consultation to date has severely affected my anxiety. I am by no means an isolated case, with the majority of my friends and neighbours feeling likewise. This is counter to the definition of sustainable development in Scottish Parliament Sustainable Development Impact Assessment (SDIA) Tool (Version 2.3), which states “a project must meet the needs of all people in existing and future communities, promoting personal wellbeing, social cohesion, and inclusion.” This is in line with The Town and Country Planning Scotland act 1997 which requires NPF4 to contribute to: "improving the health and well-being of our people."

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: 1D246A50

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The inadequacy in the assessment of alternatives raises significant concerns regarding compliance with the statutory requirements of the Environmental Impact Assessment regime. The application fails to provide a structured and reasoned comparison of

realistic alternatives based on environmental effects, instead offering a narrative account of the project's evolution. This lack of clarity suggests that less harmful options have not been properly identified, assessed, or selected over more damaging solutions.

The analysis does not include a transparent or evidence-based comparison of alternative offshore locations, development scales, or design configurations. Specifically, there is no indication that the developer has seriously explored the possibility of positioning turbines further offshore, a move that could mitigate visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, coupled with the critical importance of proximity to shore in evaluating impact, means that the absence of such analysis precludes any conclusion that the proposed siting is the least damaging option available.

Furthermore, these deficiencies extend to the cable routing and landfall assessment, where there is inadequate evidence that alternative routes have been thoroughly investigated 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 point to a failure to apply mitigation by design, relying instead on measures intended to address issues post-design.

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

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and the wellbeing of communities. The failure to conduct a structured and comparative assessment constitutes a material oversight, ultimately leading 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 flawed, resulting in an incomplete understanding of ecological receptors within the West Lewis coastal environment. This marine system is notably sensitive and biologically active, yet the methodologies employed have not adequately captured essential data regarding species presence, behaviour, and habitat use. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

A significant oversight is the failure to appropriately assess otters, which are classified as a European Protected Species. The application does not recognise their active use of coastal areas for foraging and movement, and it inadequately addresses their core

foraging range and behavioural patterns. This neglect means the potential effects of construction disturbance, noise, and increased human activity remain unassessed, undermining any claims regarding the absence of significant effects on this species.

Furthermore, the evaluation of basking sharks suffers from serious deficiencies due to a reliance on aerial surveys, which can introduce substantial detection bias, particularly under Atlantic conditions. This method is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate frequent use of the area. The omission of relevant data weakens the integrity of the baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects being based on assumptions rather than sound evidence. The lack of sufficient baseline data hampers the ability to conduct a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This absence of clarity creates uncertainty regarding the actual risks faced by marine species and their habitats.

From a regulatory standpoint, the application fails to satisfy the stipulations of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or evaluated. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt and necessitates the invocation of the precautionary principle. Therefore, consent cannot be lawfully granted under these circumstances.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development raises serious concerns regarding its potential impact on the west coast of the Isle of Lewis, an area known for its internationally significant seabird populations, many of which are in decline. The ornithological assessment associated with this application is fundamentally flawed, presenting significant gaps in evidence and internal contradictions that cast doubt on its conclusions. While the application claims that there will be no significant adverse effects on these species, it simultaneously advances a case for Habitats Regulations derogation, which should only occur if significant harm is anticipated. This contradiction raises questions about the assessment's reliability and suggests that its conclusions lack the necessary evidential support.

The assessment fails to demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of their

feeding grounds is not adequately addressed, and the reliance on modelling techniques introduces uncertainties, particularly for species facing severe declines, like Kittiwakes and Fulmars. Moreover, the methodologies employed may underestimate mortality rates due to incomplete baseline data and a lack of understanding of behavioural responses.

Additionally, the proposed siting of turbines within a recognised migratory corridor poses a serious risk, potentially obstructing a primary flight path utilised by species migrating between the United Kingdom and Iceland. There is insufficient assessment of the long-term consequences of sustained mortality in this corridor, particularly for species with relatively small global populations. From a regulatory standpoint, the application does not meet the necessary evidential standard to demonstrate no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and modelling deficiencies, indicates that the required standard of proof beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle, thereby hindering any lawful conclusion in favour of consent.

In light of these deficiencies, the application fails to comply with National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to prove that internationally important seabird populations will not be adversely impacted places the proposal in direct opposition to national policy. Taken as a whole, the assessment is rendered unreliable due to its internal inconsistencies, methodological weaknesses, and inadequate evidence, ultimately leading to the conclusion that it does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding community identity and cultural heritage is severely lacking, overlooking the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. The approach taken in the application is overly simplistic, treating heritage merely as a collection of static assets rather than acknowledging their ongoing social, cultural, and spiritual significance within the community.

There is a particular concern regarding the culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active sites of burial and spiritual practice, yet they are mistakenly classified as static features. This failure to acknowledge their continued use and meaning, along with the potential impact of development on their setting, leads to an incomplete understanding of cultural effects and dismisses their vital role in community life.

Moreover, the assessment neglects to evaluate intangible cultural heritage, which encompasses the Gaelic language, local traditions, and the enduring relationship that the community maintains with the coastal environment. These aspects are fundamental to the identity of the area, yet they are entirely omitted from the

evaluation, creating a substantial gap in understanding the cultural implications of the development.

Concerns also arise regarding community rights and the need for proper engagement. The Gaelic-speaking population, with its distinct cultural identity and characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the integrity of the assessment and fails to align with accepted principles of participation in decisions that affect cultural and environmental interests.

Additionally, a significant procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this essential assessment, the competent authority cannot meet its legal obligation to assess the social, cultural, and economic ramifications for the island community. This omission alone obstructs a lawful determination.

From a policy standpoint, these shortcomings place the proposal in direct opposition to National Planning Framework 4, particularly regarding the safeguarding of historic assets and spaces. The oversight in considering both tangible and intangible heritage, as well as failing to recognise living cultural practices, clearly deviates from established policy requirements.

Overall, the neglect to evaluate living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential void. The cultural impacts of the development remain inadequately assessed, and the application does not provide an adequate foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment undermines the Environmental Impact Assessment process. It is essential to have a comprehensive understanding of social, economic, and health impacts for developments of this magnitude, particularly when community character and functionality may be affected. Without the complete dataset, the application fails to provide a solid evidential foundation for evaluating the balance between potential benefits and harm.

Moreover, the developer's own findings highlight that the proposal is perceived as a direct threat to community identity and cohesion, with "cultural loss" being identified. However, these impacts have not been adequately incorporated into the primary application or given the necessary consideration. This omission obscures the genuine human and social costs of the development.

The assessment of social impacts, health, and wellbeing is materially deficient and lacks the transparency required for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report has not been made public. This significant evidential gap

hinders both the public and the competent authority from grasping the full extent of the social risks identified through the developer's research.

Available summaries indicate that residents are already experiencing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposal. These impacts arise from direct engagement and are therefore not speculative. However, the inability to disclose the full assessment restricts proper scrutiny of the findings and limits the capacity to ascertain their importance within the decision-making process.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments must facilitate positive health outcomes and avoid causing harm, yet the available evidence suggests existing adverse effects that have not been fully disclosed. Without the full assessment, compliance with this policy remains unproven.

The procedural implications are profound. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission represents a material shortcoming within the application and fails to meet the evidential requirements of the Environmental Impact Assessment regime.

Taken together, the non-disclosure of the complete Social Impact Assessment, along with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation prevents a lawful determination and strengthens the conclusion that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts on the seascape, landscape, and cultural heritage is fundamentally inadequate and does not sufficiently convey the extent of change or the sensitivity of the affected environment. The coastline of West Lewis is characterised by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. The proposed installation of large-scale turbines near the shoreline would introduce a continuous industrial presence, significantly altering this character and leading to a permanent and irreversible transformation of the landscape.

Moreover, the application fails to accurately represent the scale of visual change expected. The size and proximity of the turbines would dominate views from nearby residential areas, historic sites, and frequently visited coastal locations, directly impacting visual amenity while eroding the defining qualities of naturalness and remoteness. The assessment does not adequately convey the significance of this impact within the context of such a sensitive landscape.

Methodological issues also arise regarding the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully encompass the most sensitive receptors or the worst-case scenarios, particularly concerning

significant cultural heritage sites and high-value landscapes. This presents a risk that the extent of visual impact has been underestimated, which undermines the assessment's reliability.

Furthermore, the assessment neglects the interconnected relationships between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context that is visually and spatially linked to the Atlantic horizon. By treating these assets as isolated, the assessment fails to acknowledge their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The anticipated industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their connection to the natural horizon. This results not only in a visual impact but also represents a wider cultural and spatial detriment that has not been thoroughly assessed in the proposal.

From a policy standpoint, the proposal directly contradicts the National Planning Framework 4, which seeks to protect natural environments and historic assets. The proposed scale of change is at odds with the requirements to maintain landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further weakens any assertion of compliance with policy.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their visual presence would be dominant and unavoidable. Consequently, the resulting changes are fundamental and permanent, rather than amenable to reduction through mitigation measures.

Overall, the assessment inadequately represents the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings impede a reliable evaluation, reinforcing the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks associated with the proposal is severely lacking in detail, making it impossible to accurately evaluate the likely environmental effects. This application entails significant seabed preparation and installation works in the demanding conditions of the Atlantic, yet it fails to present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are intended to be formulated after consent is granted, which hinders any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises significant concerns, particularly in light of the sensitivity of the surrounding environment. The West Lewis coastline is

home to clean coastal waters and crucial habitats, which are at risk from sediment disturbance and potential contamination. Although the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it does not offer sufficient information on how these will be prevented, controlled, or monitored.

Additionally, there remains uncertainty about 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 implications of these impacts. This uncertainty also extends to potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application undermines the evaluation of whether adequate safeguards are in place to manage pollution events. This introduces procedural risks and compromises the ability of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards is at odds with the requirements set forth by the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated prior to granting consent, and the absence of such information renders a lawful determination impossible. Furthermore, the application fails to demonstrate compliance with necessary policy requirements regarding environmental protection and water quality.

Collectively, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts render the assessment fundamentally deficient. These failings prevent a thorough evaluation of construction and pollution risks and further affirm that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding its impact on local fisheries and marine ecosystems, as the assessment provided is incomplete and lacks a thorough examination of ecological and socio-economic effects. 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 adequately demonstrate how these important habitats and activities will be safeguarded from potential disruptions.

One major flaw in the proposal is the assertion that fishing activities can be displaced without any repercussions. There is no evidence presented that alternative fishing grounds exist or that they can accommodate the additional pressure resulting from displacement. This critical omission poses a risk of overfishing in other areas and could have serious economic implications for local fishermen. Without a solid, evidence-based assessment, the effects on fisheries and local livelihoods remain uncertain.

Additionally, the proposal poses significant risks to marine species, particularly due to

underwater noise created during construction activities. The anticipated high-energy hammer piling over an extended duration is expected to cause disturbances that could affect marine life over large areas, notably impacting local bottlenose dolphins. The application appears to minimize the importance of these potential effects, lacking adequate supporting evidence for such claims.

Moreover, there is a troubling inconsistency in the assessment where the requirement for licences to permit harm to European Protected Species is acknowledged, yet impacts are simultaneously claimed to be negligible. This contradiction undermines the reliability of the assessment and raises compliance issues with the Habitats Regulations, especially when potential harm is anticipated that necessitates legal authorisation.

The evaluation also neglects to take into account cumulative impacts resulting from various pressures such as habitat disturbance, noise pollution, and the displacement of fishing activities. A comprehensive assessment of these combined effects is essential to understanding the overall implications for marine ecosystems and the socio-economic landscape.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 and the National Marine Plan. It does not provide evidence that the development can coexist with existing marine users or avert unacceptable impacts on marine biodiversity, which prevents any conclusion that the proposal embodies sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The environmental assessment of the onshore infrastructure associated with this project is fundamentally lacking and fails to account for the comprehensive impacts of what constitutes a single integrated initiative. The offshore turbines and the related onshore works are interconnected; however, they are evaluated independently, leading to a disjointed approach that obscures the full extent of environmental and socio-economic repercussions.

The onshore aspects of the proposal involve cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities include excavation across regions of deep peat, particularly in Barvas Moor, which is an important carbon store and an ecologically delicate habitat. The application lacks a thorough examination of these impacts, hindering a complete understanding of the project's overall environmental implications.

By neglecting to assess the onshore impacts or deferring such evaluations, the application inhibits a proper analysis of cumulative effects. The Environmental Impact Assessment process mandates that all facets of a project are considered collectively; yet, the division between offshore and onshore components means that the cumulative impacts on peatlands, habitats, and local communities are inadequately understood.

There are also substantial threats to sensitive habitats, such as machair systems and peatland environments, which benefit from policy protection. The application fails to demonstrate that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This results in a significant evidential void concerning biodiversity conservation.

Additionally, the routing of infrastructure through active croft land raises concerns about potential conflicts with current land use and legal rights. The application does not present evidence that the required consents or processes have been set in motion, raising doubts about 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 contravenes the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application.

In summary, the disaggregation of project components, the lack of a thorough assessment, and the absence of evidence regarding environmental and land use impacts render this segment of the application incomplete and untrustworthy, ultimately obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is defined by its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and the burgeoning tourism sector, particularly astro-tourism. However, the proposal under consideration includes permanent red aviation lighting that would be visible over long distances, resulting in a continuous and intrusive “wall of light” effect across the western horizon. This would fundamentally disrupt the night-time environment, yet the assessment of dark skies and nocturnal wildlife is entirely absent from the Environmental Impact Assessment.

Significantly, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experience of both residents and visitors. The omission is particularly concerning given the vital role dark skies play in the area's identity. Furthermore, the lack of consideration for nocturnal wildlife is alarming. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting, which can lead to disorientation and an increased risk of collision. Without a lighting impact assessment or phototaxis study, the application does not address how aviation lighting might affect these species or contribute to increased mortality rates.

This issue is aggravated by an over-reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activities and associated risks. Kittiwakes, which may forage or migrate at night, also face disorientation due to artificial lighting, yet this risk remains unassessed. The absence of site-specific night-time data creates a substantial gap in understanding ecological impacts.

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

From a policy perspective, this omission contradicts the National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. It further diminishes the comprehensive assessment of landscape and seascape impacts, as the character of the night-time environment is a vital component of the overall landscape.

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

TOURISM

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

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

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

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

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

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal reveals critical shortcomings in its approach to sustainable development, failing to meet statutory duties, national policy, and evidential standards. This application mirrors the issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a key factor. Now, under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, these same concerns are raised yet again.

A reliable evidential basis for the determination is notably lacking in this proposal. There are significant gaps in baseline data, an ambiguous design envelope is used, and the mitigation measures proposed remain unspecified. Furthermore, crucial impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects have not been addressed. As a result, the Environmental Impact Assessment is inadequate, leaving a comprehensive understanding of likely significant effects or residual impacts unattainable.

The procedural aspects of the proposal also exhibit clear failures. The missing compliant Island Communities Impact Assessment breaches the statutory duty outlined in the Islands (Scotland) Act 2018. Additionally, the lack of a full Social Impact Assessment is a material omission. Such deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, this proposal is at odds with National Planning Framework 4, as it fails to protect biodiversity, natural landscapes, and cultural heritage. It does not adequately address health and wellbeing impacts and lacks evidence of any net economic benefit,

particularly due to the absence of tourism impact modelling. The cumulative effects of offshore and onshore components have not been thoroughly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and could be significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete, and some inconsistencies exist within the findings. The evidential threshold required to confidently exclude adverse effects has not been met, activating the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

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

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, hinder any lawful and evidence-based decision. The competent authority must either refuse consent based on these grounds or invoke the necessary regulatory provisions to obtain the missing information.

Thus, 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: 33032C5B

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. Upon reviewing the Environmental Impact Assessment Report and accompanying documentation, several material deficiencies have been identified across planning, environmental, cultural, and procedural aspects. The development is positioned off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, relatively untouched environment, and rich cultural heritage. Concerns arise from the scale, proximity, and design of the project, which challenge its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. Essential environmental data is absent, baseline information is sparse and inconsistent, and crucial elements of the proposal remain undefined. The flexible design framework complicates understanding the likely significant effects, while the reliance on yet-to-be-specified mitigation measures undermines the ability to assess their effectiveness. Consequently, the documentation does not provide a comprehensive understanding of the environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects lack robust supporting evidence.

There are significant policy conflicts associated with the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application fails to show that it meets national requirements for protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly relate to the statutory tests required for consent and weaken the competent authority's ability to conclude that the development is acceptable from a policy standpoint.

The unprecedented scale of the proposal poses additional concerns, with large turbines sited close to the shoreline. This raises significant issues regarding landscape capacity, visual impact, and environmental consequences. Overall, the combination of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and unsuitable for a lawful determination. In light of these factors, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The reliance on undefined project parameters creates a situation fraught with uncertainty, undermining the credibility of the Environmental Impact Assessment Report. Without specific turbine dimensions, layouts, or configurations, it is impossible to apply a consistent worst-case scenario, leaving significant gaps in understanding the potential environmental effects of the development. This lack of commitment to detail prevents both the public and the competent authority from grasping the true extent of the impacts, which is vital for informed decision-making.

Moreover, the application is heavily dependent on unestablished mitigation measures, monitoring strategies, and management plans, which cannot be evaluated at this stage. Seeking consent with the expectation that environmental harm will be addressed later is procedurally unacceptable. This approach conflicts with the fundamental purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies must be clearly outlined prior to any determination.

The report exhibits significant evidential shortcomings, including notable gaps in baseline data and methodological limitations. These deficiencies result in a reliance on assumptions rather than site-specific evidence, leading to uncertainty about the scale and significance of the impacts. Conclusions that suggest negligible or non-significant effects lack robust supporting data, which is essential for a clear understanding of cumulative and worst-case scenarios. Such scientific uncertainty cannot align with statutory requirements.

Consequently, the application does not meet the evidential threshold required under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, it does not demonstrate compliance with the National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity. The absence of a comprehensive assessment of impacts and adequate safeguards further exacerbates these concerns.

In summary, the deficiencies stemming from an undefined design envelope, lack of specified mitigation, and insufficient baseline data culminate in an Environmental Impact Assessment Report that is unreliable and incomplete. These significant shortcomings hinder a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a well-informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The inadequacy of the assessment of alternatives is significant and does not fulfil the requirements set out by the Environmental Impact Assessment regime. The application fails to provide a structured and reasoned comparison of realistic alternatives based on their environmental effects, instead opting for a narrative account of the project's evolution. This approach does not show that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

A clear and evidence-based comparison of alternative offshore locations, development scales, and design configurations is notably absent. Specifically, the application does not illustrate that the developer has thoroughly considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be lessened. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in evaluating impact, the lack of such analysis means it cannot be concluded that the proposed siting is the least damaging option.

Deficiencies are also evident in the assessment of cable routing and landfall, as there is inadequate evidence that alternative routes have been explored properly to avoid or minimise impacts on sensitive receptors. This includes culturally and spiritually significant areas such as Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis suggest that mitigation by design has not been considered, relying instead on measures to mitigate impacts after the design phase.

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

From a policy standpoint, this deficiency poses a challenge to compliance with National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment represents a material 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 regarding marine ecology and protected species lacks comprehensiveness and reliability within the West Lewis coastal environment. This region is known for its biological activity and sensitivity, yet the methodologies employed are inadequate in capturing essential aspects such as species presence, behaviour, and habitat use. Consequently, the baseline data is incomplete, failing to provide a solid foundation for assessing potential impacts.

One significant oversight is the failure to properly evaluate otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge their usage of coastal areas for foraging and movement. As a result, the assessment overlooks the core foraging range and behavioural patterns of otters, leaving the potential effects of construction disturbance, noise, and increased activity inadequately addressed. This gap in analysis undermines the conclusions regarding the absence of significant effects on this species.

In addition, the assessment of basking sharks is compromised by an overreliance on aerial surveys, which introduces considerable detection bias, especially in Atlantic conditions. This methodological choice is likely to result in an underestimation of their presence, particularly when compared to established land-based observations that indicate a frequent occurrence in these waters. The failure to include or adequately consider such critical data further weakens the reliability of the conclusions drawn.

The methodological shortcomings mean that claims of negligible or non-significant effects are based more on assumptions than on rigorous evidence. The lack of sufficient baseline data also hinders the ability to assess cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty clouds the understanding of the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the standards set by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not appropriately identified or assessed protected species. The level of uncertainty introduced prohibits the dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these circumstances, granting consent would not be legally justified.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions culminates in an assessment that lacks reliability. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species and affirm that the application does not rest on a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with the application is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. The application fails to convincingly demonstrate that these species will not be adversely affected, particularly given the development's location within key foraging areas and migratory pathways.

A fundamental contradiction exists within the application, where the developer concludes there are no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment, suggesting that the conclusions presented lack support from the underlying evidence.

The assessment does not sufficiently demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these critical feeding grounds is not fully acknowledged, and the

reliance on modelling approaches introduces uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially in instances where baseline data is lacking and behavioural responses are not completely understood.

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

From a regulatory standpoint, the application does not meet the evidential threshold required to conclude that there is 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 scenario engages the precautionary principle and obstructs a lawful conclusion in support of consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning cultural heritage and community identity is fundamentally deficient, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interlinked. The application adopts an overly simplistic approach, viewing heritage merely as a collection of static assets instead of appreciating their ongoing social, cultural, and spiritual significance to the community.

Particularly concerning is the inadequate treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practices; however, the assessment labels them as static features, neglecting their continued use and meaning, as well as the implications of development on their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural impacts and overlooks their importance in community life.

Additionally, the application neglects to address intangible cultural heritage, including the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These elements are pivotal to the area's

identity yet are conspicuously absent from the assessment, representing a significant oversight. The lack of consideration for these factors hinders a comprehensive understanding of the cultural impact of the development.

Concerns also arise regarding the rights and engagement of the community. The Gaelic-speaking population embodies a distinct cultural identity recognised as characteristic of an Indigenous People; however, there has been no implementation of a process for Free, Prior and Informed Consent. The absence of meaningful engagement undermines the credibility of the assessment and fails to adhere to established principles of participation in decisions affecting cultural and environmental interests.

Moreover, a critical procedural shortcoming is the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment inhibits the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission, in itself, prevents a lawful determination.

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

In summary, the combined failure to assess living heritage, intangible cultural values, community rights, and statutory obligations creates a significant evidential gap. The cultural implications of the development remain inadequately assessed, rendering the application insufficient for a proper evaluation of its true cultural cost.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment, which included focus groups with local residents, yet the full report remains unpublished. This lack of disclosure constitutes a significant evidential gap that hinders the public and the competent authority from grasping the complete scope of social risks identified in the developer's own research.

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

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

human and social costs associated with the development.

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

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

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment, representing a material omission within the application and a failure to fulfil the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, alongside evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This deficiency prevents a lawful determination and underscores that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

magnitude of visual impact has been downplayed, compromising the assessment's reliability.

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

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

This dependence on unspecified future measures raises serious concerns, particularly in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as sediment

mobilisation and potential accidental chemical or oil spills, it falls short of providing enough detail on how these incidents will be prevented, controlled, or monitored.

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

Moreover, the absence of comprehensive emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application restricts the ability to evaluate whether sufficient safeguards are in place to address pollution incidents. This introduces procedural risks and undermines the capacity of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigations must be evaluated prior to consent, and the lack of such information renders a lawful determination impossible. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal presents significant shortcomings in its assessment of the marine environment and fisheries, which are critical to both local ecology and economy. The West Lewis coast is home to a varied marine ecosystem and supports an active fishing industry, yet the application does not adequately address how these vital uses and habitats will be preserved without considerable disruption.

One major concern is the assumption that fishing activities can be shifted without negative repercussions. There is no evidence provided to suggest that alternative fishing grounds exist that are accessible and capable of absorbing the additional pressure resulting from displacement. This critical gap in information raises the risk of overfishing in other areas, potentially leading to wider economic ramifications for the local fishing fleet. Consequently, without a detailed, evidence-based assessment, the potential impacts on fisheries and livelihoods remain poorly understood.

Moreover, the proposal poses serious risks to marine species, particularly due to the

underwater noise associated with construction activities. The prolonged use of high-energy hammer piling is anticipated to create disturbances over extensive areas, adversely affecting marine life, including dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is a serious concern, yet the application minimizes these potential effects and lacks sufficient supporting evidence for such claims.

An inconsistency in the application arises from the acknowledgment of the need for licenses to allow harm to European Protected Species while simultaneously claiming that the impacts are negligible. This contradiction raises doubts about the validity of the assessment and casts a shadow over compliance with the Habitats Regulations, especially where harm is predicted to an extent that necessitates legal authorization.

Additionally, the cumulative impacts resulting from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities, are not sufficiently considered. A comprehensive evaluation of these combined effects is essential for understanding the overall impact on marine ecosystems and socio-economic conditions.

From a policy perspective, the application falls short of demonstrating compliance with the National Planning Framework 4 and the National Marine Plan. It does not convincingly establish that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thereby hindering any assertion that the proposal aligns with sustainable development principles.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is fundamentally flawed and fails to acknowledge the comprehensive impacts stemming from a single integrated project. The offshore turbines and onshore works are interconnected yet are evaluated separately, leading to a disjointed approach that clouds the real environmental and socio-economic consequences.

The onshore components involve cabling traversing protected moorland, the construction of a substation near Stornoway, and associated access infrastructure through delicate landscapes. These undertakings require excavation across areas of deep peat, especially within Barvas Moor, which serves as a crucial carbon store and ecologically sensitive area. The application lacks a thorough assessment of these effects, hindering a full comprehension of the project's overall environmental footprint.

By neglecting or postponing the assessment of onshore impacts, the application

obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project elements be reviewed together; however, the disconnection of offshore and onshore components results in a failure to grasp the combined impacts on peatlands, habitats, and local communities.

Moreover, there are substantial risks posed to sensitive habitats, including machair systems and peatland environments, which are under policy protection. The application does not provide evidence that the impacts on these habitats have been sufficiently assessed or that suitable avoidance measures have been enacted, leaving a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. Disturbing peatland can release stored carbon, potentially resulting in a carbon debt that contradicts the goals of renewable energy initiatives. The application inadequately addresses this concern and does not demonstrate that the overall carbon balance is beneficial.

Furthermore, routing infrastructure through active croft land may introduce conflicts with existing land use and legal rights. The application fails to offer evidence that the necessary consents or procedures have been initiated, casting doubt on its deliverability and lawful execution.

From a policy standpoint, the failure to evaluate the project as a cohesive whole and to demonstrate the protection of peatlands, habitats, and land use interests contravenes the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further diminishes the application's credibility.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The failure to assess dark skies and nocturnal wildlife represents a significant oversight in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting will create a pervasive "wall of light" effect across the western horizon, fundamentally transforming the night-time environment.

Moreover, the application lacks an evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. Given the integral role of dark skies in the area's identity and in emerging sectors like astro-tourism, this omission is particularly concerning. The absence of such assessments creates a clear gap in the overall landscape and environmental evaluation.

Equally troubling is the lack of analysis regarding impacts on nocturnal wildlife. Species

such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and increased collision risk. The application does not include any assessment of lighting impacts or phototaxis studies, resulting in a failure to understand how aviation lighting may affect these species or contribute to increased mortality.

This issue is exacerbated by the dependence on daytime survey data within the ornithological assessment, which fails to account for nocturnal activity or associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time data creates a critical shortfall in understanding the ecological impacts.

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

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

In summary, the absence of any assessment pertaining to dark skies and nocturnal wildlife signifies a considerable evidential gap. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of facilitating a lawful determination.

TOURISM

The Isle of Lewis relies heavily on its tourism sector, which has seen significant growth, increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the local economy. The assessment of tourism impacts related to the proposed development is materially deficient, neglecting to evaluate the economic and social consequences for this crucial sector. The application acknowledges that 86% of visitors are attracted by the area's scenery, yet it fails to provide a quantified assessment of how large-scale offshore infrastructure might affect visitor numbers, behaviour, or overall economic contribution.

Additionally, the analysis does not consider the vital role that environmental quality plays in supporting tourism. Key elements such as unspoiled landscapes and dark skies are essential to the visitor experience and contribute to emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, leaving a significant gap in understanding the potential impacts on a recognized and expanding part of the local economy.

In an island community with limited economic diversification, the failure to assess the implications for tourism extends beyond economics, affecting employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been properly evaluated in accordance with the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impact and the necessity to demonstrate net benefit. It also contradicts strategic objectives that highlight tourism as a priority growth sector. Consequently, the lack of sufficient evidence prevents the competent authority from adequately assessing the economic consequences of the proposal.

Overall, the failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and consider the island's economic dependency results in a significant evidential gap. This deficiency hampers a thorough evaluation of economic effects and indicates 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 visit the graveside of relatives at Dalmore, the new development will change this place forever, reducible a place of great rare natural beauty into an industrial zone. Out beautiful island is being destroyed

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: C3272BC2

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.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development presents significant concerns regarding the adequacy of the assessment of marine ecology and protected species within the West Lewis coastal environment. This area is known for its sensitivity and biological activity, yet the provided baseline data is insufficient, and the methodologies employed fail to thoroughly capture species presence, behaviour, and habitat use. Consequently, the assessment does not deliver a reliable evidential basis for evaluating potential impacts.

A notable shortcoming is the treatment of otters, which are classified as a European Protected Species. The application does not appropriately acknowledge or assess their use of coastal areas for foraging and movement. By neglecting to consider their core foraging range and behavioural patterns, the potential effects of construction disturbances, noise, and increased activity have not been sufficiently evaluated. This oversight calls into question any conclusions drawn regarding the absence of significant effects on otters.

Furthermore, the assessment of basking sharks exhibits deficiencies, primarily due to reliance on aerial surveys that introduce considerable detection bias, particularly under Atlantic conditions. This reliance is likely to lead to an underestimation of the species' presence, particularly when compared to established land-based observations that indicate frequent usage of these waters. The failure to incorporate or adequately consider this relevant data results in an incomplete baseline, thereby undermining the reliability of the conclusions drawn.

These methodological inadequacies lead to assertions of negligible or non-significant effects that are based more on assumptions than on solid evidence. The lack of adequate baseline data further hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out in the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been adequately identified or assessed. The uncertainty introduced by these shortcomings prevents the exclusion of adverse effects beyond reasonable scientific doubt and necessitates the application of the precautionary principle. In light of these factors, the granting of consent is not legally permissible.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment related to the proposed development is profoundly inadequate, exhibiting numerous internal inconsistencies and significant evidence gaps that undermine its findings. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already experiencing decline. However, the application fails to convincingly demonstrate that these species will not suffer adverse effects. This development is situated in key foraging areas and migratory paths, yet the assessment does not thoroughly explore the implications of displacement, collision risk, or habitat loss.

A striking contradiction arises within the application itself, where the developer claims that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is necessary only when significant harm is anticipated. Such inconsistencies cast doubt on the reliability of the assessment, suggesting that the conclusions drawn are not supported by adequate evidence. Furthermore, the assessment lacks sufficient proof that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will be unaffected. The critical importance of these feeding grounds has not been fully recognised, and the reliance on modelling techniques introduces further uncertainty, particularly concerning species in severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially when baseline data is incomplete and the behavioural responses of the species are not well understood.

The placement of turbines within a recognised migratory corridor presents an additional, significant risk, as it effectively creates a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The application fails to adequately assess the long-term consequences of sustained mortality in this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential criteria necessary to ascertain that there will be no adverse effects on the integrity of protected sites. The presence of contradictory findings, combined with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, hindering any lawful conclusion that might support consent.

The identified deficiencies further indicate a failure to comply with the National Planning Framework 4, specifically 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 contradiction with national policy.

Collectively, these issues render the assessment unreliable, characterised by internal inconsistencies, methodological flaws, and insufficient evidence. These shortcomings obstruct a thorough evaluation of the impacts and lead to the conclusion that the application does not fulfil the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application demonstrates a critical lack of understanding regarding community rights and engagement. The Gaelic-speaking population, with its distinct cultural identity and characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. This failure to engage meaningfully with the community undermines the validity of the assessment and does not align with established principles that emphasise participation in matters affecting cultural and environmental interests.

Moreover, the assessment neglects the significance of intangible cultural heritage, such as the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These vital elements are essential to the area's identity but are glaringly absent from the evaluation, leading to a substantial oversight. The cultural impact of the development cannot be comprehensively understood without addressing these factors.

The examination of cultural heritage and community identity is fundamentally inadequate, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply interconnected. Rather than appreciating heritage as an active, living component of the community, the application adopts a narrow view, treating it as isolated and static assets.

Key deficiencies arise in the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice; however, they are categorised as static features in the assessment. This mischaracterisation ignores their ongoing use and meaning, as well as the development's impact on their setting, resulting in an incomplete evaluation of cultural effects and a disregard for their significance within community life.

A significant procedural failing is the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence 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 any determination unlawful.

From a policy standpoint, these shortcomings directly conflict with National Planning Framework 4, particularly concerning the preservation of historic assets and places. The failure to consider both tangible and intangible heritage, along with the neglect of living cultural practices, constitutes a clear deviation from policy requirements.

In summary, the application's inability to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations creates a substantial evidential gap. The cultural impacts of the proposed development remain improperly evaluated, and the application falls short of providing a sufficient basis for understanding the true cultural cost of the project.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises significant concerns regarding the assessment of social impacts, health, and wellbeing. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report remains unpublished. This absence creates a notable evidential gap, hindering both public understanding and the competent authority's capacity to grasp the full scope of social risks highlighted in the developer's research.

Summaries that are available reveal that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement with the community and are therefore not mere speculation. Nonetheless, the lack of disclosure of the complete assessment limits proper scrutiny and undermines the significance of these findings in the decision-making process.

The proposal is also viewed as a threat to community identity and cohesion, with findings indicating "cultural loss" identified in the developer's own research. Despite these critical insights, they have not been sufficiently integrated into the main application or given the weight they deserve. The decision to withhold the full Social Impact Assessment obscures the true human and social cost associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this scale, particularly in relation to community character and functioning. Without the complete dataset, the application fails to provide an adequate evidential basis to assess the balance between potential benefits and harm.

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

The implications of these procedural shortcomings are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation due to the absence of the full Social Impact Assessment. This represents a material omission in the application and a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of pre-existing adverse impacts, renders the assessment incomplete and unreliable. This situation precludes a lawful determination and emphasises that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts associated with the proposed development is lacking and does not adequately convey the extent of change or the sensitivity of the local environment. The West Lewis coastline, characterised by its open Atlantic horizon and undeveloped landscape, possesses a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a persistent and overwhelming industrial presence, fundamentally altering this character and leading to a permanent transformation of the landscape.

The application fails to fully capture the scale of this visual change. Due to their size and proximity, the turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations. This would adversely affect visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not adequately reflect the significance of this impact within such a sensitive landscape.

Concerns also arise regarding the choice and representation of visual viewpoints in the assessment. There are indications that the viewpoints selected may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly in relation to important cultural heritage sites and high-value landscapes. This raises the possibility that the extent of visual impact has been downplayed, which compromises the reliability of the assessment.

Moreover, there is a notable deficiency in the evaluation of the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape, connected visually and spatially to the Atlantic horizon. The assessment treats these heritage assets as isolated rather than acknowledging their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering how heritage assets are experienced and their relation to the natural horizon. This change signifies not just a visual impact but also a wider cultural and spatial harm that has not been sufficiently evaluated in the proposal.

From a policy perspective, this proposal stands in direct conflict with National Planning Framework 4, particularly concerning the protection of natural spaces and historic assets. The scale of change proposed is inconsistent with the need to maintain landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of compliance with policy guidelines.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and closeness of the turbines, their presence would be overwhelming and unavoidable. Thus, the resultant change is not merely something that can be reduced to an acceptable level through mitigation efforts; it is fundamental and permanent.

Overall, the assessment does not accurately portray the scale of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is at odds with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies in its assessment of construction and pollution risks, which are essential for evaluating potential environmental effects. It entails extensive seabed preparation and installation activities within a high-energy Atlantic environment, yet lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. The application instead proposes to rely on mitigation and contingency measures that would be formulated after consent, which hinders any substantial assessment of their sufficiency or effectiveness.

This reliance on unspecified future measures is alarming, particularly in light of the sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to sediment disturbance and contamination. While the application recognises risks such as sediment mobilisation and accidental chemical or oil spills, it does not offer adequate detail on methods for prevention, control, or monitoring of these risks.

Moreover, there remains uncertainty regarding the scale and dynamics of sediment plumes generated from seabed disturbance and cable installation. In the absence of rigorous modelling and explicitly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty extends to possible effects on marine species and habitats already identified as sensitive within the broader assessment.

The lack of thorough emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether suitable safeguards are available to address pollution incidents. This situation not only introduces procedural risk but also undermines the capacity of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of crucial environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated prior to granting consent, and the absence of such information renders any lawful determination impossible. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the combination of undefined mitigation measures, insufficient management plans, and uncertainty about potential impacts renders the assessment materially inadequate. These inadequacies obstruct a thorough evaluation of

construction and pollution risks and further substantiate the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of fisheries and marine life presented in the application is inadequate and lacks a thorough assessment of both ecological and socio-economic impacts. Specifically, the waters off the West Lewis coast host a rich marine ecosystem alongside a functioning fishing industry, yet the application fails to adequately safeguard these critical uses and habitats from potential significant disruption.

A notable concern arises from the presumption that fishing activities can simply be relocated without repercussions. The application does not provide any substantiated evidence that alternative fishing grounds are either available, accessible, or able to accommodate increased pressure. This significant gap raises the risk of overfishing in other areas and may lead to broader economic consequences for the local fishing fleet. In the absence of a well-supported evaluation, the implications for fisheries and livelihoods remain unclear.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise associated with construction activities. The anticipated high-energy hammer piling over an extended timeframe is expected to cause disturbances over extensive distances, impacting species such as dolphins. Concerns arise from the predicted disruption to a substantial portion of the local bottlenose dolphin population, yet the application inadequately addresses the significance of these effects, lacking sufficient supporting evidence.

Additionally, the application reveals a contradictory stance regarding the need for licences to permit harm to European Protected Species, while simultaneously characterising such impacts as negligible. This inconsistency casts doubt on the reliability of the assessment and raises issues of compliance with the Habitats Regulations, particularly when harm is expected to a level that necessitates legal authorisation.

The assessment neglects to consider cumulative impacts resulting from multiple pressures such as habitat disturbance, noise pollution, and the displacement of fishing activities. A thorough 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 that the proposed development can operate alongside existing marine users or avoid unacceptable impacts on marine biodiversity, obstructing any conclusion that the proposal constitutes sustainable development.

In summary, the insufficiencies in evidence regarding fishing displacement, the

underestimation of acoustic impacts, and the internal contradictions significantly compromise the credibility of the assessment. These shortcomings hinder a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure remains notably incomplete and fails to acknowledge the full extent of impacts resulting from a single integrated project. The offshore turbines and onshore works are inherently connected, yet they are evaluated separately, leading to a fragmented assessment that obscures the true scale of environmental and socio-economic consequences.

Onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure through delicate landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which is a vital carbon store and ecologically sensitive habitat. The application lacks a thorough evaluation of these impacts, thus hindering a comprehensive understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application obstructs a proper analysis of cumulative effects. The Environmental Impact Assessment process mandates that all facets of a project be considered collectively, yet the division of offshore and onshore elements results in a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

There are considerable risks to sensitive habitats, including machair systems and peatland environments, which enjoy policy protection. The application fails to prove that the impacts on these habitats have been adequately assessed or that suitable avoidance measures have been taken. This results in a clear evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. The disturbance of peatland releases stored carbon, which could create a carbon debt that undermines the objectives of renewable energy development. The application does not sufficiently tackle this issue or show that the overall carbon balance remains beneficial.

Furthermore, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application does not provide evidence that the necessary consents or processes have been initiated, casting doubt on the project's deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project comprehensively and to ensure 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 demonstrate that impacts can be avoided or mitigated further weakens the application.

In summary, the separation of project components, the absence of a thorough

assessment, and the lack of evidence concerning environmental and land use impacts render this segment of the application incomplete and unreliable, impeding a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The application fails to include any evaluation of nocturnal wildlife, which is a serious oversight. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be particularly sensitive to artificial lighting. Their behaviour, affected by phototaxis, can lead to disorientation and increased risk of collision. The lack of a lighting impact assessment or a phototaxis study means there is no understanding of how the proposed aviation lighting could affect these species or potentially increase their mortality rates.

Additionally, the application does not consider the impact of the proposed permanent red aviation lighting on visual amenity, landscape character, or the overall experience for both residents and visitors. This is particularly concerning given the significance of dark skies to the region's identity and its tourism potential, particularly in relation to astro-tourism. The introduction of lighting visible over long distances would create an intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

The reliance on daytime survey data in the ornithological assessment is problematic, as it overlooks the nocturnal activity of species such as Kittiwakes, which may forage or migrate at night. This lack of site-specific night-time data leads to a crucial gap in understanding the ecological impacts of the proposal.

Moreover, without assessing the impacts on nocturnal wildlife and dark skies, it remains impossible to establish whether protected species or designated sites could be adversely affected. The evidential standard required to demonstrate that adverse effects are unlikely cannot be satisfied. This situation invokes the precautionary principle and hinders a lawful determination of the proposal.

From a policy standpoint, this omission contradicts National Planning Framework 4, which relates to the protection of natural areas and the quality of the environment. It also detracts from the comprehensive evaluation of landscape and seascape impacts, as the character of night-time settings is an essential component of the overall environment.

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

TOURISM

The Isle of Lewis community faces significant concerns regarding the application due to the inadequate assessment of tourism impacts, which is critical for the local economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Although the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of this key sector.

Tourism on the Isle has seen remarkable growth, rising from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs, accounting for up to 16% of the island's economy. However, the application does not consider how the industrialisation of the seascape and a decline in environmental quality could affect Tourism Gross Value Added or broader economic resilience. Without this critical analysis, it remains unclear whether the proposed development would yield a net economic benefit or instead harm an established and expanding industry.

Furthermore, the assessment neglects the significance of environmental quality in promoting tourism, particularly the value of unspoiled landscapes and dark skies to visitors. The lack of a Dark Skies Assessment worsens this issue, leading to a serious gap in understanding the impacts on a recognised and growing segment of the local economy, including nature-based and astro-tourism markets.

In an island community with limited economic diversity, the failure to evaluate tourism impacts has broader implications for employment, local enterprises, and community sustainability. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been considered as mandated by the Islands (Scotland) Act 2018.

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

The combined failures to quantify tourism impacts, assess environmental influences on visitor behaviour, and acknowledge the island's economic dependencies create a substantial evidential gap. This hinders a thorough evaluation of economic effects and reinforces the conclusion that the application lacks completeness.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the criteria of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. It mirrors the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This latest application is now presented within a stronger policy framework that emphasises biodiversity, peatland

protection, landscape integrity, and community wellbeing.

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

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

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

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

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

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

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

Additional Comments

I fear for the Westside of the Isle of Lewis, the impact this will have on marine and bird life is indescribable. The loss of the dark skies and the blot on the landscape will affect tourism which the island relies on.

Personally this proposal is detrimental to my mental health, we moved here for the peace and quiet and a more slower pace of life, now all I think about is the whirr of the blades and the red lights I will see at night from my window. No thought has been put into the mental anguish of the people of the west coast.

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: B5AB317C

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

Dear Sir/Madam

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

The application lacks a robust evidential basis for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, several key components of the proposal remain undefined. The use of a flexible design framework hinders a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures renders any evaluation of their effectiveness impossible. Consequently, the documentation fails to offer a comprehensive understanding of the environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects lack adequate support from reliable evidence.

There are evident and serious conflicts with established 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 landscapes, cultural heritage, and health and wellbeing. It does not convincingly demonstrate that national mandates to safeguard biodiversity, climate interests, and environmental integrity will be fulfilled. These conflicts are critical to the statutory tests required for consent and undermine the competent authority's ability to determine that the development meets policy standards.

The scale of the proposed development is unprecedented for this area, with large turbines situated alarmingly close to the shoreline, which introduces substantial concerns about landscape capacity, visual dominance, and environmental repercussions. Collectively, the insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and unfit to support a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is incomplete and fails to provide a clear and trustworthy account of the potential environmental effects of the proposal. The approach of using a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This lack of specificity undermines the assessment's reliability and means the impacts described may not accurately represent the final development, limiting the ability of the public and the competent authority to grasp the true environmental effects.

The application depends significantly on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under these conditions means that environmental harm will be addressed later, which hinders any genuine evaluation of effectiveness or assessment of remaining impacts. This deferral of critical information to post-consent stages is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies should be clearly outlined before determination.

Furthermore, there are notable evidential shortcomings, such as gaps in baseline data, methodological limitations, and reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially where negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information obscures the understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to meet statutory requirements.

As a result, the application does not satisfy the evidential threshold mandated by the Habitats Regulations, which requires the exclusion of adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal also does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it is not established that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the reliance on an unspecified design envelope, the absence of clearly defined mitigation measures, and gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These issues hinder a lawful and robust assessment of environmental effects and leave the competent authority unable to make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application has significant deficiencies in the assessment of alternatives, which fails to comply with the statutory requirements of the Environmental Impact Assessment regime. It does not provide a structured and reasoned comparison of realistic alternatives based on their environmental effects. Instead, it offers a narrative about the project's evolution, which does not adequately show that less harmful options have been thoroughly identified, assessed, and chosen over more damaging

ones.

There is a lack of transparent and evidence-based comparisons for alternative offshore locations, development scales, and design configurations. Notably, the application does not indicate that the developer has seriously considered placing turbines further offshore, where the impacts on visual, ecological, and coastal factors would likely be lessened. The sensitivity of the West Lewis coastline makes this analysis crucial, as proximity to the shore is essential in determining the project's overall impact. The failure to include such an analysis means there is no basis to conclude that the chosen site represents the least damaging option.

This inadequacy is also present in the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The absence of a clear avoidance strategy and comparative analysis suggests that the application has not employed mitigation by design, relying instead on post-design measures.

As a result, the application does not demonstrate 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 impedes the competent authority's ability to determine if less harmful and more suitable alternatives are available. The lack of a robust assessment of alternatives raises questions about the sustainability and policy compliance of the proposal.

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, particularly in terms of safeguarding natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission, contributing to the overall conclusion that the application lacks adequate evaluation and cannot support a lawful determination.

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

The west coast of the Isle of Lewis is home to internationally important seabird populations that are already in decline, yet the application fails to adequately prove that these species will not be adversely affected. Key foraging areas and migratory pathways, which are crucial for these populations, are not thoroughly evaluated in the assessment, particularly regarding displacement, collision risk, and habitat loss. The methodologies employed tend to underestimate potential mortality rates, especially given the incomplete baseline data and limited understanding of species' behavioural responses.

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

The inadequacies identified also represent a failure to adhere to the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely impacted places the proposal in direct contradiction to national policy. Collectively, these issues render the assessment unreliable, due to its methodological weaknesses and insufficient evidence, preventing a comprehensive evaluation of impacts and leading to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

The treatment of culturally significant sites is also concerning. Cemeteries at Dalmore, Bragar, and Barvas are places of active burial and spiritual significance. However, the assessment incorrectly categorises these sites as static features. This oversight neglects their ongoing use and the impact of development on their context, leading to a deficient evaluation of cultural effects.

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of a complete Social Impact Assessment critically undermines the evaluation of social impacts, health, and wellbeing associated with the development proposal. While a Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, the absence of the full report introduces a significant evidential gap. This gap prevents both the public and the competent authority from understanding the breadth of social risks highlighted in the developer's own research.

Summaries available indicate that residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement with the community and are not speculative in nature. However, the failure to disclose the complete assessment limits the opportunity for proper scrutiny of the findings, which in turn affects their significance within the decision-making process.

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

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

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

complete assessment, it is impossible to ascertain compliance with this policy.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would result in a dominant industrial presence, fundamentally transforming this character and causing a permanent alteration to the landscape. The assessment presented fails to represent the scale of this visual change adequately, as the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, adversely impacting visual amenity and eroding the naturalness and remoteness of the area.

Concerns arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not effectively capture the most sensitive receptors or potential worst-case scenarios, particularly concerning significant cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been understated, thereby undermining the assessment's reliability.

Moreover, the relationship between landscape, seascape, and cultural heritage has not been sufficiently explored. Notably, sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context, which is visually and spatially linked to the Atlantic horizon. By treating these sites as isolated assets, the assessment neglects their interdependence, leading to an incomplete evaluation of their setting and cultural significance.

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

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The extent of change threatens the safeguarding of landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the absence of a rigorous worst-case

assessment calls into question any claims of policy compliance.

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

Overall, the assessment is inadequate in accurately portraying the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation, reinforcing the conclusion that the proposal is incompatible with the necessary protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application lacks the necessary detail to assess construction and pollution risks adequately. It involves significant seabed preparation and installation in the challenging conditions of the Atlantic, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, it depends on mitigation and contingency measures that are to be formulated after consent, making it impossible to meaningfully evaluate their effectiveness.

This lack of clearly defined future measures is alarming, especially considering the delicate nature of the West Lewis coastline, which features clean coastal waters and sensitive habitats at risk from sediment disturbance and pollution. While the application acknowledges potential risks such as sediment mobilisation and accidental chemical spills, it fails to detail how these issues will be managed or mitigated.

Moreover, there is considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from the proposed activities. Without thorough modelling and well-defined management strategies, it is not feasible to ascertain the extent or ecological implications of these disturbances, including their effects on marine species and habitats that are known to be vulnerable.

The situation is exacerbated by the absence of detailed emergency response procedures. Deferring essential contingency planning to after consent restricts the ability to evaluate whether appropriate measures are in place for addressing pollution incidents, increasing procedural risk and hindering the competent authority's ability to enforce environmental safeguards at the determination stage.

From a regulatory standpoint, the postponement of crucial environmental protections contradicts the stipulations of the Environmental Impact Assessment framework. Significant effects and mitigation strategies must be reviewed before granting consent, and when vital information is absent, a lawful decision cannot be reached. The application also does not demonstrate adherence to policies regarding environmental protection and water quality.

Overall, the lack of defined mitigation strategies, inadequate management plans, and uncertainty surrounding potential environmental impacts collectively render the assessment severely deficient. These issues hinder a thorough evaluation of construction and pollution risks and further confirm that the application is incomplete.

FISHERIES AND MARINE LIFE

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

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

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

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

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

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

constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents a fragmented assessment of onshore infrastructure, which fails to fully address the integrated nature of the project. The offshore turbines and associated onshore works are fundamentally linked, yet the current evaluation treats them separately, leading to an incomplete understanding of the environmental and socio-economic impacts.

The onshore works entail significant developments, such as cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities will involve excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. As it stands, the application does not provide a thorough assessment of these impacts, thus failing to convey 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 stipulates that all elements of a project must be considered collectively. However, the disjunction between offshore and onshore components leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

There are notable risks posed to sensitive habitats, including machair systems and peatland environments, which are protected under existing policy. The application lacks sufficient evidence to show that these habitats have been thoroughly assessed or that suitable avoidance measures are in place, revealing a significant gap in biodiversity protection.

Concerns regarding carbon balance are also raised by the proposal. Disturbing peatland can release stored carbon, potentially incurring a carbon debt that contradicts the goals of renewable energy development. The application fails to sufficiently address this matter or to demonstrate that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land may lead to conflicts with established land use and legal rights. The application does not present evidence indicating that the necessary consents or processes have been undertaken, thereby casting doubt on the project's deliverability and lawful execution.

From a policy standpoint, the inability to assess the project comprehensively and to show that peatlands, habitats, and land use interests are protected stands in contradiction to the National Marine Plan and National Planning Framework 4. The lack of evidence demonstrating that impacts can be avoided or mitigated further compromises the application.

In conclusion, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts lead to an incomplete and unreliable application, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife is a substantial oversight within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposed development would introduce permanent red aviation lighting, creating a continuous and intrusive "wall of light" that would drastically change the night-time atmosphere.

There has been no examination of how this lighting will impact visual amenity, landscape character, or the experiences of both residents and visitors. This neglect is particularly troubling given the significance of dark skies to the area's identity and the growth of tourism sectors such as astro-tourism. The failure to evaluate these impacts highlights a clear deficiency in the overall landscape and environmental assessment.

More importantly, the proposal does not consider the effects on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to their phototactic behaviour, which can lead to disorientation and a higher risk of collisions. The application lacks a lighting impact assessment or phototaxis study, meaning it does not address how aviation lighting could affect these species or increase mortality rates.

This issue is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activities or their associated risks. Kittiwakes, for instance, may forage or migrate at night and are equally susceptible to disorientation caused by artificial lighting, yet this risk remains unexamined. The lack of specific night-time data creates a critical void in understanding ecological impacts.

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

From a policy standpoint, this omission contradicts the National Planning Framework 4 regarding the preservation of natural areas and environmental quality. It also detracts

from the comprehensive evaluation of landscape and seascape effects, as night-time character is a fundamental aspect of the environment.

Overall, the complete 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 inadequate and unable to support a lawful determination.

TOURISM

The omission of a comprehensive analysis of tourism impacts presents a significant gap in the assessment of this application. The tourism sector on the Isle of Lewis plays a crucial role in the local economy, having grown from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application does not adequately evaluate how the proposed large-scale offshore infrastructure might affect visitor numbers, behaviour, or the overall economic contribution of tourism, despite acknowledging that 86% of visitors are attracted by the scenery.

Environmental quality is vital for tourism, and the assessment neglects the essential role of unspoiled landscapes and dark skies in shaping visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this deficiency, hindering an understanding of impacts on a recognised and expanding segment of the local economy.

In an island community with limited economic diversification, this failure to assess the implications for tourism has broader consequences for employment, local businesses, and community sustainability. Furthermore, the absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately evaluated, as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not meet the criteria outlined in the National Planning Framework 4, particularly concerning economic impact and the necessity to demonstrate net benefit. It contradicts strategic objectives that prioritise tourism as a 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 the environmental factors influencing visitor behaviour, and acknowledge the island's economic dependency culminates in a serious evidential gap. This gap obstructs a thorough evaluation of economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm starkly fails to meet the standards for sustainable development, as evaluated against legal obligations, national policy, and evidential criteria. This application repeats fundamental issues that led to

the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. It is now being submitted under a more robust policy framework, which emphasises the importance of biodiversity, peatland conservation, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis needed for a proper assessment of the application. It lacks comprehensive baseline data, continues to employ an undefined design envelope, depends on unspecified mitigation measures, and omits key impact pathways such as those concerning nocturnal wildlife, full onshore infrastructure, and tourism consequences. This results in an incomplete Environmental Impact Assessment, which fails to provide a full understanding of the likely significant effects or residual impacts.

Moreover, clear procedural shortcomings are evident. The failure to produce a compliant Island Communities Impact Assessment is a violation of statutory duties under the Islands (Scotland) Act 2018, while not disclosing the complete Social Impact Assessment amounts to a significant omission. Such shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for a lawful determination.

The proposal directly contravenes the National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural environments, or cultural heritage, nor does it prove that health and wellbeing impacts are acceptable. Additionally, it fails to provide evidence of a net economic benefit owing to the lack of tourism impact assessments. The cumulative effects of both offshore and onshore components have not been adequately evaluated, clouding potential impacts on peatlands, carbon balance, habitats, and agricultural land.

Environmental risks associated with the project remain ambiguous and could be significantly detrimental. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The application does not meet the evidential threshold necessary to confidently conclude that adverse effects can be ruled out, thereby invoking the precautionary principle, which complicates any lawful declaration of acceptable impacts.

Furthermore, the project would lead to considerable and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and the disruption of cultural and visual connections, along with the repercussions for tourism, represent lasting effects that cannot be adequately mitigated.

In conclusion, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, impede a lawful, evidence-based decision. The competent authority should refuse consent on these bases or invoke relevant regulatory provisions

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

Additional Comments

Our wild salmon stocks are already impacted by fish farms and climate change. Work around the areas of the Creed River will potentially cause further strains on the salmon numbers. This in turn will affect recreational pursuits for local people and for tourism.

The tranquility of the island will be majorly impacted by the works being carried out, again causing locals and tourists inconvenience. Plus it will impact the visual enjoyment for tourists, which is a major employer and therefore will impact earnings.

Also this development will industrialise the island, but not necessarily provide longterm employment for local people, also the local population will not benefit from the production of electricity because we pay higher prices for supply!

For those living in the areas where these temporary villages will be built and additional construction of further road accesses, this is a great worry as to how it will affect their day to day lives, with larger volumes of traffic around plus the disruption these will cause ie children coming home from school, playing etc.

Our seas are rich in wildlife which again will suffer from this development. There are no worthy mitigations being considered for this impact, and it is obvious from other developments of this kind that there will be consequences for whales, dolphins etc. Again the impact on sea bird populations will be disastrous as this proposed development is on a migratory route.

I would love to know how this development managed to get to this stage when it is obviously so badly planned and of course the consequences of the development will be nicely packaged away from Westminster and Holyrood as out of sight, never mind!!

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: 3C4308D6

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is informed by a review of the Environmental Impact Assessment Report and supporting documents, highlighting notable 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 untouched environment, and significant cultural heritage. Concerns arise regarding the proposal's scale, proximity, and design in relation to its compliance with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation necessary for a lawful determination. There are gaps in critical environmental data, while baseline information is both limited and inconsistent. Additionally, essential elements of the proposal remain unspecified. The application employs a flexible design framework, which obscures the understanding of potential significant effects. The reliance on yet-to-be-defined mitigation measures means their effectiveness cannot be evaluated. Consequently, the provided documentation falls short of facilitating a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by reliable evidence.

Substantial conflicts with policy are apparent. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and well-being. It does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory tests needed for consent and compromise the competent authority's ability to ascertain that the development aligns with policy expectations.

The unprecedented scale of the proposal poses significant challenges in this location, with large turbines planned in close proximity to the shoreline, raising serious issues regarding landscape capacity, visual dominance, and environmental consequences. Collectively, the deficiencies in information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy violations illustrate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary completeness and transparency to reliably convey the likely environmental effects of the proposed development. The reliance on a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty undermines the assessment's integrity and hinders a consistent application of a worst-case scenario, thereby obscuring the true extent of potential environmental impacts from both the public and the competent authority.

Moreover, the application is heavily dependent on unspecified mitigation measures, monitoring strategies, and management plans, which have yet to be defined. Seeking consent under these circumstances, with the intention to address environmental harm at a later stage, impedes a meaningful evaluation of the effectiveness of these measures and hinders the assessment of any residual impacts. This deferral of critical information to post-consent phases is procedurally improper and contradicts the fundamental purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly established prior to determination.

There are also notable evidential shortcomings, such as gaps in baseline data, limitations in the employed methodology, and an overreliance on assumptions rather than site-specific evidence. This situation leads to uncertainty about the scale and significance of impacts, especially where negligible or non-significant effects are claimed without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

As a result, the application does not fulfil the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to the National Planning Framework 4, including obligations related to biodiversity protection and environmental integrity, as it cannot be confirmed 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 deficiencies in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings prevent a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application presents significant shortcomings regarding the assessment of alternatives, failing to comply with the statutory requirements of the Environmental Impact Assessment regime. It offers a narrative account of project evolution instead of

a structured comparison of realistic alternatives based on environmental effects. This method does not prove that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

There is no clear or evidence-based examination of alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has adequately considered placing turbines further offshore, where visual, ecological, and coastal impacts are likely to be lessened. The sensitivity of the West Lewis coastline and the crucial role of proximity to shore in assessing impact highlight that this lack of analysis undermines the claim that the proposed siting is the least damaging option available.

This inadequacy also extends to the assessment of cable routing and landfall, with insufficient evidence to suggest that alternative routes have been thoroughly investigated to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis indicate that mitigation by design has not been considered, instead relying on post-design measures for mitigation.

Consequently, the application does not show that environmental harm has been minimised through site selection, layout, and infrastructure routing. This indicates a failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, one cannot conclude that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this lack of thorough assessment weakens compliance with National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that leads to the conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The West Lewis coastal environment is a highly sensitive and biologically active marine system, yet the assessment of marine ecology and protected species is materially deficient. It does not deliver a complete or reliable understanding of the ecological receptors in this area. The baseline data remains incomplete, and the methodologies employed fail to adequately capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a solid evidential basis for evaluating the potential impacts.

There is a significant omission concerning otters, which are classified as a European Protected Species. The application does not appropriately acknowledge or assess their active use of coastal regions for foraging and movement. This disregard for their core foraging range and behavioural patterns results in an inadequate assessment of

potential effects stemming from construction disturbances, noise, and increased activity. Such shortcomings undermine any conclusions related to the absence of significant effects on this species.

Further issues emerge regarding the assessment of basking sharks, where reliance on aerial surveys creates a substantial detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to adequately incorporate or consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological inadequacies lead to conclusions of negligible or non-significant effects that are founded on assumptions rather than robust evidence. The lack of sufficient baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the actual scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment regime or National Planning Framework 4, as it 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 necessitating 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 shortcomings obstruct a thorough evaluation of the 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 conducted is deeply flawed, exhibiting serious internal inconsistencies and significant gaps in evidence that undermine its findings. The application does not meet the necessary evidential standard to demonstrate that the internationally important seabird populations along the west coast of the Isle of Lewis, which are already experiencing declines, will not be adversely impacted. Key foraging areas and migratory pathways are within the development's location; however, the assessment inadequately addresses the risks associated with displacement, collision, and habitat loss.

A critical contradiction arises in the application, where the developer asserts there are no significant adverse effects while simultaneously submitting a Habitats Regulations derogation case, which is typically invoked when significant harm is anticipated. This inconsistency raises serious doubts about the credibility of the assessment, indicating that the conclusions drawn are not backed by the requisite evidence. Furthermore,

there is insufficient evidence presented to confirm that seabirds linked to protected sites such as the Lewis Peatlands and St Kilda will be unaffected. The significance of these feeding grounds has not been adequately considered, and the reliance on modelling techniques introduces further uncertainty, particularly for species like Kittiwakes and Fulmars that are already in critical decline. The methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the lack of comprehensive understanding of behavioural responses.

The placement of turbines within an established migratory corridor poses an additional severe risk, effectively obstructing a primary flight path for species migrating between the United Kingdom and Iceland. The assessment fails to sufficiently evaluate the long-term implications of ongoing mortality in this corridor, as well as the potential repercussions for species with small global populations.

From a regulatory standpoint, the application does not satisfy the evidential requirements needed to conclude that there would be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle, obstructing a lawful conclusion that would support the granting of consent.

Moreover, the identified deficiencies represent a failure to comply with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to assure that internationally important seabird populations will remain unaffected positions the proposal in direct opposition to national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposal is fundamentally inadequate and lacks the necessary transparency for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the complete report remains unpublished. This absence of information creates a significant evidential gap, hindering both the public and the competent authority from comprehending the full range of social risks highlighted by the developer's research.

Available summaries reveal that residents are already facing 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. Nevertheless, the failure to disclose the complete assessment restricts proper scrutiny of these findings and limits the ability to evaluate their importance within the decision-making framework.

There is also recognition 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 acknowledgment, these impacts have not been adequately considered in the main application or given the necessary weight. The withholding of the full Social Impact Assessment obscures the actual human and social costs tied to the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health effects is vital for developments of this magnitude, particularly where community character and functionality may be impacted. By not providing the complete dataset, the application fails to present a thorough evidential basis for evaluating the balance between benefits and harms.

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

The procedural ramifications are considerable. The competent authority cannot perform a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission in the application and signifies a failure to satisfy the evidential requirements of the Environmental Impact Assessment process.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal seeks to introduce large-scale turbines along the West Lewis coastline, an area characterised by its open Atlantic horizon, undeveloped nature, and pronounced sense of remoteness. This installation would establish a continuous industrial presence near the shoreline, leading to a fundamental and irreversible transformation of the landscape. The assessment of the seascape, landscape, and visual impacts associated with this proposal is materially deficient, failing to accurately represent the scale of change or the sensitivity of the receiving environment.

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

lead to an understatement of the visual impact and compromise the assessment's reliability.

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The application lacks the necessary detail to assess environmental impacts, particularly concerning construction and pollution risks. There is a significant reliance on future mitigation and contingency measures that are to be developed after consent, which raises immediate concerns about the adequacy and effectiveness of such plans. This is especially troubling given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to disturbance and contamination from sediment.

Risks associated with sediment mobilisation and accidental spills of chemicals or oil have been acknowledged in the application; however, there is insufficient information on how these risks will be managed, controlled, or monitored. Furthermore, there is considerable uncertainty regarding the nature and scale of sediment plumes that may result from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the potential ecological effects, duration, or extent of these impacts. This uncertainty also applies to marine species and habitats that are already recognised as sensitive within the broader

assessment.

The shortcomings are exacerbated by the absence of detailed emergency response procedures. By postponing contingency planning until after consent, the application undermines the ability to evaluate whether adequate measures are in place to address pollution events. This creates procedural risks and limits the competent authority's capacity to assess environmental protection effectively at the point of determination.

From a regulatory standpoint, this deferral of critical environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. It is essential that significant effects and mitigation measures be evaluated before consent is granted, and the lack of such information means that a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with essential policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The evaluation of the proposal's impacts on fisheries and marine life is inadequate, lacking a comprehensive assessment of both ecological and socio-economic factors. The waters along the West Lewis coast are home to a rich marine ecosystem and support an active fishing industry. However, the application does not convincingly show that these vital habitats and fishing activities will be preserved without significant disruption.

A significant concern is the presumption that fishing activities can be shifted without repercussions. The application does not provide evidence that alternative fishing grounds exist, are accessible, or can sustain the additional pressure resulting from this displacement. This gap is crucial, as it raises the risk of overfishing in other areas, which could have broader economic implications for the local fishing fleet. Without a clear and well-substantiated evaluation, the potential impacts on both fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses serious risks to marine species, particularly due to underwater noise associated with construction activities. The use of high-energy hammer piling over an extended duration is expected to create disturbances that could affect a wide range of species, including dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population is concerning, yet the application minimizes these impacts without adequate evidence.

Inconsistencies within the application further undermine its credibility. While it acknowledges the need for licences to permit harm to European Protected Species, it

simultaneously describes the impacts as negligible. This contradiction raises serious questions regarding compliance with the Habitats Regulations, especially since harm is expected at a level that necessitates legal authorisation.

The assessment does not adequately consider cumulative impacts stemming from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. A thorough evaluation of these combined effects is essential to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not sufficiently establish that the development can coexist with current marine users or that it can avoid unacceptable impacts on marine biodiversity, thereby preventing any conclusion that the proposal is sustainable.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed development lacks a comprehensive assessment of onshore infrastructure, resulting in an incomplete evaluation of the project's impacts. The offshore turbines and the associated onshore works are interconnected; however, their assessment is conducted separately. This fragmented approach obscures the full extent of the environmental and socio-economic consequences of what is essentially a singular integrated project.

The onshore infrastructure includes cabling that traverses protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. These operations entail excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive area. The application fails to provide a thorough assessment of these impacts, which hinders a complete understanding of the project's overall environmental footprint.

By neglecting to adequately assess the onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all aspects of a project should be evaluated collectively. The existing separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain unclear.

Moreover, there are substantial risks posed to sensitive habitats, including machair systems and peatland environments that are protected by policy. The application does not adequately demonstrate that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This raises serious concerns about biodiversity protection and highlights a significant evidential

gap.

The proposal also brings forth issues regarding carbon balance. Disturbing peatland can release stored carbon, potentially resulting in a carbon debt that contradicts renewable energy objectives. The application inadequately addresses this matter and fails to show that the overall carbon balance is favourable.

Additionally, routing infrastructure through active croft land may conflict with existing land use and legal rights. The application does not supply evidence that the necessary consents or processes have been initiated, which raises doubts about the project's deliverability and legal implementation.

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

In summary, the combination of separating project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts renders this section of the application incomplete and unreliable, inhibiting a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The failure to assess dark skies and nocturnal wildlife represents a significant oversight in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting will create a pervasive "wall of light" effect across the western horizon, fundamentally transforming the night-time environment.

Moreover, the application lacks an evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. Given the integral role of dark skies in the area's identity and in emerging sectors like astro-tourism, this omission is particularly concerning. The absence of such assessments creates a clear gap in the overall landscape and environmental evaluation.

Equally troubling is the lack of analysis regarding impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and increased collision risk. The application does not include any assessment of lighting impacts or phototaxis studies, resulting in a failure to understand how aviation lighting may affect these species or contribute to increased mortality.

This issue is exacerbated by the dependence on daytime survey data within the ornithological assessment, which fails to account for nocturnal activity or associated

risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time data creates a critical shortfall in understanding the ecological impacts.

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

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

In summary, the absence of any assessment pertaining to dark skies and nocturnal wildlife signifies a considerable evidential gap. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of facilitating a lawful determination.

TOURISM

The application acknowledges that 86% of visitors are attracted to the Isle of Lewis due to its scenery. However, it fails to provide a quantified assessment of how large-scale offshore infrastructure may influence visitor numbers, behaviours, or the overall economic contribution of tourism. This oversight is critical, given that tourism plays a significant role in the local economy, having grown from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy.

Furthermore, the assessment does not consider how the industrialisation of the seascape and a decline in environmental quality could impact Tourism Gross Value Added or the economic resilience of the area. Without this analysis, it remains uncertain whether the proposed development would yield a net economic benefit or jeopardise a vital and expanding sector.

In addition, the role of environmental quality is not addressed, specifically regarding unspoiled landscapes and dark skies, which are crucial to visitor experience and emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this issue, resulting in a significant gap in understanding the impacts on a recognised and growing sector of the local economy.

The implications extend beyond just tourism; in an island community with limited economic diversification, the lack of a comprehensive assessment of tourism impacts raises concerns for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means these

economic vulnerabilities, as required under the Islands (Scotland) Act 2018, have not been evaluated.

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the standards of sustainable development as mandated by statutory duties and national policy. It echoes the principal issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not address these concerns adequately.

There are significant gaps in the evidential basis provided for the application. The reliance on an undefined design envelope, unspecified mitigation measures, and the lack of crucial impact assessments, such as those affecting nocturnal wildlife, complete onshore infrastructure, and tourism, renders the Environmental Impact Assessment incomplete. This inadequacy impedes a thorough understanding of the potential significant effects and residual impacts associated with the project.

Moreover, procedural shortcomings are evident, notably the absence of a compliant Island Communities Impact Assessment, which violates statutory requirements under the Islands (Scotland) Act 2018. The non-disclosure of a complete Social Impact Assessment is another critical omission. These failures hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal is also misaligned with the National Planning Framework 4. It does not demonstrate the necessary protections for biodiversity, natural environments, and cultural heritage, nor does it show that health and wellbeing impacts are manageable. Furthermore, the lack of tourism impact modelling means that a net economic benefit cannot be substantiated. The cumulative impacts of both offshore and onshore components have not been properly evaluated, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks persist, with incomplete assessments

concerning marine ecology, seabirds, protected species, and marine mammals. The evidential threshold needed to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle. This failure prevents a lawful determination that impacts are acceptable.

The proposed development would also effect substantial and irreversible changes to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the degradation of dark skies, disruption to cultural and visual connections, and adverse impacts on tourism are permanent consequences that cannot be mitigated effectively.

In conclusion, the application is procedurally and substantively unfit for determination. The significant deficiencies in information, coupled with policy discrepancies and unresolved environmental risks, obstruct a lawful and evidence-based decision-making process. The competent authority should therefore 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: 85F558A9

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the marine licensing and Environmental Impact Assessment frameworks. The objection is founded on a thorough review of the Environmental Impact Assessment Report and accompanying documents, which reveal significant deficiencies in planning, environmental considerations, cultural implications, and procedural integrity. Located off the west coast of the Isle of Lewis, the development is situated in an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. The design, scale, and proximity of the proposed development raise serious concerns about its compliance with statutory obligations, national policy, and sustainable development principles.

There is an alarming lack of a sound evidential foundation within the application, as critical environmental data is absent, baseline information remains limited and inconsistent, and essential components of the proposal are not defined. The flexible design framework undermines the ability to assess likely significant effects, while the reliance on unspecified mitigation measures hampers any evaluation of their effectiveness. 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 evidence to support them.

The proposal presents clear and serious policy conflicts, appearing at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests necessary for consent and cast doubt on the ability of the competent authority to deem the development acceptable from a policy perspective.

The unprecedented scale of the proposal, with large turbines positioned perilously close to the shoreline, raises significant issues regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential deficiencies, and apparent policy non-compliance illustrates that the application is fundamentally incomplete and incapable of securing a lawful determination. Given these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally lacking, failing to deliver a comprehensive, clear, or dependable overview of the anticipated environmental repercussions of the proposal. The reliance on a flexible Project Design Envelope, which does not commit to particular turbine dimensions, layouts, or configurations, creates a considerable degree of uncertainty. This uncertainty undermines the reliability of the assessment, meaning that the potential impacts may not accurately reflect the development that will ultimately be built. Consequently, both the public and the competent authority are left without a proper understanding of the true scope of environmental effects.

Moreover, the application places significant emphasis on mitigation measures, monitoring strategies, and management plans that have yet to be established. By seeking consent on the premise that environmental damage will be mitigated later, there is a lack of opportunity for meaningful evaluation of these measures or assessment of any residual impacts. This postponement of crucial information to stages following consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which stipulates that likely significant effects and mitigation must be clearly defined before determination.

The report also exhibits serious evidential shortcomings, with gaps in baseline data, limitations in methodology, and an over-reliance on assumptions rather than site-specific evidence. This leads to uncertainties about the scale and significance of impacts, particularly when findings of negligible or non-significant effects are presented without solid supporting data. The insufficient information hinders a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory obligations.

As a result, the application does not satisfy the evidential criteria required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, since it cannot be shown that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specific mitigation, and the deficiencies in baseline data culminate in an Environmental Impact Assessment Report that is neither reliable nor complete. These issues preclude a lawful and rigorous evaluation of environmental effects, leaving the competent authority ill-equipped to make a determination based on the information presented.

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 assessment of marine ecology and protected species is inadequate and fails to offer a reliable understanding of the ecological receptors in the West Lewis coastal environment. This area is a biologically active marine system, yet it suffers from incomplete baseline data and methodologies that do not effectively capture species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential basis for evaluating impacts.

A significant gap exists concerning otters, which are a European Protected Species. The application does not sufficiently acknowledge or assess their active use of coastal areas for foraging and movement. This omission regarding their core foraging range and behavioural patterns means that the potential impacts from construction disturbance, noise, and increased activity have not been properly evaluated. Such shortcomings undermine any conclusions drawn about the absence of significant effects on this

species.

There are also notable deficiencies in the evaluation of basking sharks. The use of aerial surveys creates a significant detection bias, particularly under Atlantic conditions, leading to an underestimation of their presence. This issue is further highlighted when compared to established land-based observations that indicate frequent use of these waters. The failure to integrate or adequately consider such data results in an incomplete baseline, which further weakens the reliability of the conclusions made.

These methodological shortcomings mean that assertions of negligible or non-significant effects are based on assumptions rather than on robust evidence. The lack of sufficient baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This creates uncertainty regarding the actual scale 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 has not properly identified or assessed protected species. The level of uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, consent cannot be legally granted.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies obstruct a robust evaluation of impacts on marine ecology and protected species, leading to the 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. The ornithological assessment associated with the development application is materially flawed and fails to demonstrate to the required evidential standard that these species will not be adversely affected. The application does not adequately evaluate key foraging areas and migratory pathways, neglecting to consider the implications of displacement, collision risk, or habitat loss.

A fundamental contradiction within the application arises as the developer concludes that there are no significant adverse effects, while simultaneously presenting a Habitats Regulations derogation case, which is only necessary where significant harm is anticipated. This inconsistency raises concerns regarding the reliability of the assessment, indicating that the conclusions drawn are unsupported by the underlying evidence. The assessment lacks sufficient evidence to ensure that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected, and does not fully account for the importance of these feeding grounds. Moreover, the reliance on modelling approaches introduces uncertainty, particularly for species in severe decline, including Kittiwakes and Fulmars. The methodologies employed may

underestimate mortality rates, particularly where baseline data is incomplete and behavioural responses remain inadequately understood.

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

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

These deficiencies also indicate a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Collectively, the assessment is rendered unreliable due to internal inconsistencies, methodological weaknesses, and insufficient evidence, which impede a robust evaluation of impacts and support the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development on the West Lewis coastline lacks a thorough assessment of cultural heritage and community identity, failing to recognise the area as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. The approach taken in the application reduces heritage to mere static assets, overlooking their ongoing social, cultural, and spiritual roles within the community.

A significant oversight is evident in how culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites serve as active places of burial and spiritual practice, yet they are categorised as static features in the assessment, which disregards their continued use, significance, and the impact of development on their surroundings. This misrepresentation leads to an incomplete understanding of cultural effects and dismisses their importance in community life.

Additionally, 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 aspects are vital to the area's identity but are conspicuously missing from the analysis, marking a considerable omission. This lack of consideration hinders a comprehensive understanding of the cultural impact of the development.

There are also critical concerns related to community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity, recognised as an Indigenous People, yet there has been no implementation of Free, Prior and Informed Consent. This failure to engage meaningfully undermines the credibility of the assessment and does not adhere to established participatory principles regarding decisions that affect cultural and environmental interests.

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

From a policy standpoint, these deficiencies put the proposal at odds with the National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to acknowledge both tangible and intangible heritage, along with the neglect of living cultural practices, constitutes a clear violation of policy requirements.

Overall, the lack of assessment regarding living heritage, intangible cultural value, community rights, and adherence to statutory requirements results in a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to offer a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing assessment is significantly lacking in transparency, rendering it inadequate for lawful evaluation. Although a Social Impact Assessment was commissioned by the developer and included input from local residents through focus groups, the complete report remains unpublished. This lack of disclosure creates a substantial evidential gap, which hinders both the public and the competent authority from grasping the full scope of social risks highlighted by the developer's own research.

Summaries that are accessible reveal that residents are currently suffering from measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These issues stem from direct engagement with the community and are thus firmly rooted in reality. However, the absence of the full assessment prevents thorough scrutiny of these findings and constrains the ability to evaluate their importance in the decision-making process.

Furthermore, there is clear evidence that the proposal is viewed as a threat to community identity and cohesion, with the developer's findings highlighting "cultural loss." Despite this, such impacts have not been adequately incorporated into the primary application or given the necessary consideration. The failure to release the complete Social Impact Assessment effectively obscures the genuine human and

social costs associated with the development.

This lack of transparency is detrimental to the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health effects is crucial for projects of this magnitude, especially when community character and functionality may be compromised. By withholding the complete dataset, the application does not provide a thorough evidential foundation for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 concerning health and wellbeing. Developments must foster positive health outcomes and mitigate harm, yet available evidence points to existing negative impacts that have not been fully disclosed. Without the complete assessment, it is impossible to affirm compliance with this policy.

The procedural ramifications are significant, as the competent authority cannot conduct a robust socio-economic and health evaluation in the absence of the full Social Impact Assessment. This constitutes a material omission in the application and signifies 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, alongside evidence of current adverse impacts, renders the assessment inadequate and untrustworthy. This inhibits a lawful determination and strengthens the argument that the application is unsupported by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment conducted regarding seascape, landscape, and visual impacts is lacking in material detail and does not adequately consider the extent of change or the sensitivity of the environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The proposed installation of large-scale turbines in proximity to the shoreline would introduce an overwhelming industrial presence, fundamentally transforming this character and resulting in a permanent and irreversible alteration of the landscape.

There is a concerning inadequacy in how the application represents the scale of visual change. The size and closeness of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, which would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately express the significance of this impact within the context of such a vulnerable landscape.

Moreover, there are methodological issues regarding the choice and presentation of visual viewpoints. Evidence indicates that the selected viewpoints may not comprehensively represent the most sensitive receptors or the worst-case scenarios,

especially concerning vital cultural heritage sites and high-value landscapes. This raises the concern that the magnitude of visual impact has been understated, compromising the reliability of the assessment.

Another critical shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context interlinked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated entities rather than recognising their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The extent of change is incompatible with the imperative to protect landscape character, visual amenity, and the settings of culturally important sites. The lack of a thorough worst-case assessment further undermines any assertion of policy adherence.

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

In summary, the assessment fails to accurately capture the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a dependable evaluation and reinforce the conclusion that the proposal is at odds with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks presented in this application is significantly lacking and fails to deliver the necessary detail for a thorough assessment of potential environmental impacts. Involvement in extensive seabed preparation and installation activities in a high-energy Atlantic setting is proposed, yet there are no well-defined Construction Environmental Management Plans or Pollution Prevention Plans in place. Instead, the application leans on mitigation and contingency strategies that are intended to be formulated after consent has been granted, inhibiting a genuine appraisal of their potential effectiveness or adequacy.

This dependency on unspecified future measures is particularly alarming, considering the delicate nature of the receiving environment. The coastline of West Lewis is home to clean coastal waters and crucial habitats that are sensitive to disturbances from

sediment and contamination. Although the application acknowledges risks associated with sediment mobilisation and accidental chemical or oil spills, it fails to provide ample detail on preventative, control, or monitoring strategies.

There is also considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without comprehensive modelling and clearly established 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 recognised as sensitive within the broader assessment framework.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application obstructs the ability to evaluate whether adequate safeguards are in place to manage pollution incidents. This creates procedural risks and diminishes the capacity of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment framework. Significant effects and mitigation must be evaluated before consent can be granted, and in the absence of this information, a lawful determination is unattainable. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation strategies, the absence of detailed management plans, and the uncertainty surrounding potential impacts culminate in a materially deficient assessment. These deficiencies hinder a comprehensive evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents a concerning lack of evidence regarding the potential displacement of fishing activity. It assumes that such displacement can occur without negative consequences, yet it fails to establish whether alternative fishing grounds are available, accessible, or capable of accommodating the increased pressure. This oversight is critical, as the risk of overfishing in other areas poses a threat not only to marine life but also to the economic stability of the local fishing fleet. The implications for fisheries and livelihoods remain inadequately addressed, leaving serious questions about the long-term sustainability of these practices.

Moreover, the risks posed to marine species, particularly from underwater noise during construction, are alarmingly understated. The use of high-energy hammer piling is anticipated to generate disturbances over considerable distances, which may adversely affect species such as dolphins. The anticipated impact on a significant portion of the local bottlenose dolphin population raises profound concerns, yet the application minimizes these effects without providing compelling supporting evidence.

There is a notable inconsistency within the application itself, where it acknowledges the need for licences to permit harm to European Protected Species, while simultaneously asserting that the impacts are negligible. This contradiction not only undermines the credibility of the assessment but also raises significant doubts about compliance with the Habitats Regulations, particularly in scenarios where anticipated harm would necessitate legal authorisation.

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

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not provide sufficient evidence that the development can coexist harmoniously with current marine users or that it can avert unacceptable impacts on marine biodiversity, which are essential for concluding that the proposal aligns with the principles of sustainable development.

In summary, the glaring deficiencies regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the application render the assessment both incomplete and unreliable. These issues critically hinder any reliable evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents significant deficiencies in its assessment of onshore infrastructure, which is critical to understanding the complete impact of what is essentially a single integrated project. The offshore turbines and the associated onshore works are interconnected, yet they are evaluated separately. This fragmented approach obscures the true scale of the environmental and socio-economic effects involved.

Onshore works encompass the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, which is not only a vital carbon store but also an ecologically delicate habitat. The assessment fails to provide a thorough evaluation of these impacts, hampering a complete understanding of the project's overall environmental footprint.

Moreover, the omission or postponement of the assessment concerning onshore impacts hinders the ability to evaluate cumulative effects properly. The Environmental Impact Assessment process is designed to consider all components of a project collectively; however, the disparate treatment of offshore and onshore elements leaves

the combined impacts on peatlands, habitats, and local communities inadequately understood.

There are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are under policy protection. The application does not show that it has fully assessed the impacts on these habitats or that suitable avoidance measures have been put in place, resulting in a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding the carbon balance as the disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts renewable energy development goals. This issue has not been adequately addressed in the application, nor is there sufficient demonstration that the overall carbon balance remains advantageous.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The application lacks an assessment of dark skies and nocturnal wildlife, which is a significant omission in the Environmental Impact Assessment. The coastline of West Lewis features exceptionally dark skies that contribute to environmental quality, cultural identity, and tourism. However, the proposal introduces permanent red aviation lighting that would create a continuous and intrusive light effect across the western horizon, fundamentally changing the night-time environment.

There is no evaluation of how this lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly important as dark skies play a critical role in the area's identity and the growth of sectors like astro-tourism. The absence of this analysis creates a clear gap in the overall landscape and environmental assessment.

Moreover, impacts on nocturnal wildlife have not been evaluated. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly

sensitive to artificial lighting, which can lead to disorientation and increased risk of collision. The application fails to include any assessment of lighting impacts or phototaxis studies, meaning the potential effects on these species and the risk of increased mortality remain unexamined.

This issue is further complicated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time data leaves a critical gap in understanding ecological impacts.

Without an assessment of nocturnal impacts, it is impossible to determine whether protected species or designated sites would face adverse effects. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt cannot be fulfilled, which invokes the precautionary principle and impedes a lawful determination.

From a policy standpoint, this omission goes against National Planning Framework 4 concerning the protection of natural places and environmental quality. It also compromises the overall assessment of landscape and seascape impacts, as the character of night-time is an essential part of the environment.

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

TOURISM

The failure to assess the implications of the proposed development on tourism represents a significant oversight, given the economic dependency of the Isle of Lewis on this sector. Tourism has increased notably, with its contribution rising from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and accounting for up to 16% of the local economy. The absence of a thorough analysis regarding how large-scale offshore infrastructure might alter visitor numbers and behaviours hinders an accurate understanding of the potential impacts on economic contribution.

Tourism thrives on the area's wild coastline, near-pristine landscapes, and dark skies, all of which provide a unique visitor experience. The application acknowledges that 86% of tourists are attracted by the scenery, yet it does not offer a quantified assessment of how the industrialisation of the seascape could detract from these vital attractions. The lack of consideration for environmental quality, particularly concerning unspoiled landscapes and dark skies, further complicates the evaluation of the tourism sector's potential decline.

Moreover, the failure to incorporate a Dark Skies Assessment leaves a critical gap in

understanding the effects on nature-based and astro-tourism, both of which are emerging markets that could significantly benefit the local economy. In an island community where economic diversification is limited, this lack of assessment has broader ramifications for employment, local businesses, and community sustainability.

The submission also falls short in meeting policy requirements, failing to demonstrate adherence to the National Planning Framework 4 regarding economic impacts and the necessity to show net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to evaluate the economic consequences of the proposal adequately.

Taken collectively, the deficiencies in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and recognising the economic vulnerabilities of the island culminate in a significant evidential gap. This situation precludes a thorough evaluation of the economic effects and suggests that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. It revisits the significant issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. This current application is presented under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still does not comply.

Critical deficiencies are evident in the evidential basis for assessment. The application lacks comprehensive baseline data, utilises an undefined design envelope, and relies on unspecified mitigation measures. Furthermore, it neglects vital impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is insufficient, preventing a thorough understanding of potential significant effects or residual impacts.

Additionally, procedural shortcomings are apparent. The failure to provide a compliant Island Communities Impact Assessment contravenes the Islands (Scotland) Act 2018, and the incomplete Social Impact Assessment constitutes a serious omission. These lapses hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal conflicts directly with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural spaces, and cultural heritage, nor does it prove that health and wellbeing impacts are acceptable. The lack of tourism impact modelling means that net economic benefit cannot be evidenced. Moreover, the cumulative effects of both offshore and onshore elements have not been

properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and possibly significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and making it impossible to lawfully conclude that impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The combination of significant information deficiencies, policy inconsistencies, and unresolved environmental risks obstructs the possibility of a lawful and evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or require the submission of the missing information through relevant regulatory mechanisms.

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

Additional Comments

I believe this wind farm would have a huge negative impact on mine, my families, and my communities life. It would ruin the unique views that I believe are the best in the world and has no regard for my culture. It will eradicate a lot of the reasons that I enjoy living here in my homeland so much. It is ridiculous to claim that this is a project that will help 'save the environment' when it will impact it so negatively.

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: 69861E1D

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with the marine licensing and Environmental Impact Assessment regulations. A thorough review of the Environmental Impact Assessment Report and the accompanying documentation reveals several material deficiencies across planning, environmental, cultural, and procedural aspects. The project is located off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of this proposal, alongside its proximity to the shoreline, raise fundamental questions about its alignment with statutory requirements, national policy, and sustainable development principles.

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency, failing to adequately account for the likely environmental effects associated with the proposal. The use of a flexible Project Design Envelope, which does not commit to specific turbine sizes, layouts, or configurations, introduces considerable uncertainty. This flexibility undermines the integrity of the assessment process and prevents a consistent application of a worst-case scenario. Consequently, the impacts presented may not accurately reflect the development that is ultimately built, thereby hindering both public understanding and the ability of the competent authority to grasp the true extent of environmental effects.

Furthermore, the application leans heavily on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under the premise that environmental harm will be mitigated later inhibits a thorough evaluation of effectiveness and the assessment of residual impacts. This postponement of essential information until after consent is granted is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment framework, which stipulates that significant effects and mitigation strategies must be clearly established before any determination can occur.

Evidential deficiencies are also notable, with significant gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This situation results in uncertainty concerning the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information impedes a clear understanding of cumulative and worst-case impacts, generating scientific uncertainty that cannot align with statutory obligations.

As a result, the application does not meet the evidential threshold mandated by the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. The precautionary principle becomes particularly relevant regarding protected species and sensitive habitats. Additionally, the proposal does not comply with National Planning Framework 4, which includes stipulations related to biodiversity protection and environmental integrity, as it fails to 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 measures, and gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and rigorous assessment of environmental effects, meaning the competent authority lacks the necessary information to make an informed decision on the application.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed application presents significant shortcomings in its assessment of marine ecology and protected species in the West Lewis coastal environment. This area is known for its sensitivity and biological activity, yet the baseline data is insufficient. The methodologies used do not adequately account for the presence, behaviour, and

habitat use of various species. Consequently, the assessment fails to offer a reliable basis for understanding the potential impacts.

A notable gap in the evaluation concerns otters, which are classified as a European Protected Species. The application does not adequately recognise their active use of coastal zones for foraging and movement. The assessment neglects to consider their core foraging range and behavioural patterns, which leads to an insufficient evaluation of potential impacts from construction disturbance, noise, and increased human activity. This undermines claims about the absence of significant effects on otters.

Additionally, the assessment of basking sharks contains flaws. The reliance on aerial surveys introduces a risk of detection bias, especially under Atlantic conditions, which could result in an underestimation of their presence. This is particularly concerning when compared to established land-based observations that show frequent use of these waters. Ignoring or inadequately addressing this information further undermines the baseline data and weakens the conclusions drawn.

The methodological weaknesses mean that conclusions regarding negligible or non-significant effects rely on assumptions rather than solid evidence. The lack of adequate baseline data also hampers the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual risks to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the requirements set by the Environmental Impact Assessment regime and National Planning Framework 4, as there has been inadequate identification or assessment of protected species. The uncertainty generated prevents the exclusion of adverse effects beyond reasonable scientific doubt, invoking the precautionary principle. Therefore, consent cannot be lawfully granted under these conditions.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant shortcomings regarding the protection of biodiversity, failing to meet the evidential standards necessary to ascertain that no adverse effects will occur to protected sites. The presence of contradictions within the application undermines the assessment's reliability. Notably, while the developer asserts that no significant adverse effects will arise, this claim is juxtaposed with the advancement of a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. Such inconsistencies raise serious concerns about the validity of the conclusions drawn, indicating a lack of robust support from the underlying evidence.

The application overlooks the critical importance of key foraging areas and migratory pathways for seabird populations on the west coast of the Isle of Lewis, which are internationally recognised and currently face declining numbers. The assessment fails to adequately evaluate crucial factors such as displacement, collision risk, and habitat loss, particularly concerning seabirds tied to protected sites like the Lewis Peatlands and St Kilda. The reliance on modelling approaches raises uncertainties, especially for species experiencing severe declines, such as Kittiwakes and Fulmars. Additionally, the methodologies employed likely underestimate potential mortality rates, as they do not fully account for incomplete baseline data or the complexities of behavioural responses.

The siting of turbines within a recognised migratory corridor poses a further significant risk by creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor, as well as the potential impact on species with small global populations, have not been sufficiently addressed in the application.

From a regulatory standpoint, the evidence presented does not satisfy the necessary threshold to determine that protected sites' integrity will remain unaffected. The assessment's contradictory conclusions, along with data gaps and methodological limitations, indicate that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, thereby preventing a lawful conclusion that would support the granting of consent.

In summary, the ornithological assessment suffers from serious internal inconsistencies, methodological flaws, and a lack of substantial evidence, rendering it unreliable. Collectively, these deficiencies hinder an accurate evaluation of the impacts and indicate that the application does not fulfil the statutory requirements essential for determination, thereby conflicting with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

The assessment also overlooks intangible cultural heritage, such as the Gaelic language and traditions, along with the deep connection between the community and

the coastal environment. These aspects are vital to the identity of the area and their absence signifies a significant omission. Without addressing these factors, the cultural impact of the development cannot be accurately assessed.

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

Moreover, evidence indicates that the development is seen as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's own findings. Yet, these critical impacts have not been adequately integrated into the main

application or given the weight they deserve. The withholding of the complete Social Impact Assessment thus obscures a comprehensive understanding of the social risks involved.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal involves the introduction of 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 development would create a continuous industrial presence that fundamentally alters the existing landscape, resulting in a permanent and irreversible transformation. The application fails to accurately represent the magnitude of visual change that would result from the turbines, which would dominate views from residential areas, historic sites, and popular coastal locations, thereby impacting visual amenity and eroding the qualities of naturalness and remoteness.

Additionally, there are methodological issues concerning the selection and presentation of visual viewpoints within the assessment. It appears that some viewpoints do not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight introduces the risk of understating the visual impact, which ultimately undermines the reliability of the entire assessment.

Another significant shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. By treating these sites as isolated rather than recognising their interdependence, the assessment results in an incomplete evaluation of the impacts on their setting and cultural significance. The proposed industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and severing their relationship with the natural horizon. This effect represents not only a visual impact but also a broader cultural and spatial harm that the application fails to adequately assess.

From a policy standpoint, the proposal conflicts with National Planning Framework 4,

particularly regarding the protection of natural places and historic assets. The scale of change is at odds with the obligation to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further detracts from any claims of policy compliance.

Moreover, the impacts identified 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 something that can be reduced to an acceptable level through mitigation measures.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks sufficient detail necessary for a thorough evaluation of construction and pollution risks, which is particularly concerning given the project's location along the West Lewis coastline. This area is known for its clean coastal waters and important habitats that could be significantly affected by sediment disturbance and contamination. The application does acknowledge certain risks, such as sediment mobilisation and the possibility of accidental chemical or oil spills; however, it does not adequately detail the measures that will be implemented to prevent, control, or monitor these risks.

Substantial seabed preparation and installation works are proposed in a high-energy Atlantic environment, yet there are no developed Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that are intended to be prepared after consent, which limits any meaningful assessment of their effectiveness and adequacy.

The uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation is another critical concern. Without robust modelling or clearly defined management strategies, the potential extent, duration, or ecological impacts cannot be accurately assessed. This uncertainty extends to marine species and habitats identified as sensitive in the wider assessment.

Moreover, the lack of detailed emergency response procedures further complicates the situation. By postponing contingency planning to a post-consent phase, the application hampers the evaluation of whether appropriate safeguards can be put in place to manage pollution events. This procedural risk undermines the competent authority's ability to assess environmental protection measures adequately.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. It is essential for likely significant effects and mitigation strategies to be evaluated prior to

consent, and the absence of this information means that a lawful determination cannot be achieved. Furthermore, the application fails to demonstrate compliance with the relevant policy requirements concerning environmental protection and water quality.

In summary, the deficiencies in defined mitigation measures, the absence of detailed management plans, and the uncertainties regarding potential impacts collectively render the assessment materially inadequate. These gaps further support the conclusion that the application lacks completeness.

FISHERIES AND MARINE LIFE

The proposal presents significant shortcomings in its assessment of fisheries and marine life, which is critical given the rich marine ecosystem and vibrant fishing industry off the West Lewis coast. It fails to adequately protect or maintain these vital habitats while raising concerns about socio-economic impacts. A fundamental flaw lies in the assumption that fishing activities can be easily displaced. The application lacks evidence to show that alternative fishing grounds are both available and capable of accommodating the additional pressure, which poses a risk of overfishing elsewhere and could have detrimental effects on local livelihoods.

Moreover, the proposal introduces serious risks to marine species, particularly due to the underwater noise generated from construction activities. The anticipated long-duration hammer piling is expected to disturb marine life over large distances, notably impacting the local bottlenose dolphin population. The application seems to minimise the importance of these disturbances, offering insufficient evidence to support its claims.

In a troubling contradiction, the application acknowledges the necessity for licences to allow for potential harm to European Protected Species while simultaneously describing the anticipated impacts as negligible. This inconsistency casts doubt on the assessment's credibility and raises alarms regarding compliance with the Habitats Regulations, especially where anticipated harm may necessitate legal authorisation.

Additionally, the assessment does not account for the cumulative impacts from various pressures such as habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined factors, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic conditions tied to them.

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

In summary, the deficiencies in the assessment regarding fishing displacement, underappreciation of acoustic impacts, and internal contradictions render the

evaluation incomplete and unreliable, hindering a thorough understanding of the potential repercussions on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

Onshore elements involve the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. Excavation in areas of deep peat, particularly within Barvas Moor, is particularly concerning as it is a crucial carbon store and an ecologically sensitive habitat. The application does not provide a thorough assessment of these impacts, limiting the understanding of the project's overall environmental footprint.

By not assessing the onshore impacts adequately, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process requires a comprehensive consideration of all project components, but the separation of offshore and onshore works prevents a full understanding of their combined effects on peatlands, habitats, and local communities.

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

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

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

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

Overall, the separation of project components, the absence of a comprehensive

assessment, and the lack of evidence regarding environmental and land use impacts contribute to an incomplete and unreliable application, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal fails to include an assessment of dark skies and nocturnal wildlife, which represents a significant oversight in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are integral to the environmental quality, cultural identity, and tourism appeal of the area. The introduction of permanent red aviation lighting that can be seen from great distances would create a persistent and intrusive “wall of light” effect on the western horizon, fundamentally changing the night-time landscape.

This application does not evaluate how the lighting will affect visual amenity, landscape character, or the experiences of both residents and visitors. The absence of this analysis is particularly concerning given the value of dark skies to the local identity and the growing interest in tourism sectors like astro-tourism. The neglect to consider these factors results in a clear shortfall in the environmental and landscape assessment.

Moreover, there is no examination of the impact on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly affected by artificial lighting due to their phototactic responses, which can result in disorientation and heightened risks of collision. The application does not provide any lighting impact assessment or phototaxis study, neglecting to evaluate the potential consequences of aviation lighting on these species or the risk of increased mortality.

The reliance on daytime survey data in the ornithological assessment exacerbates this issue, as it does not account for nocturnal behaviours or associated hazards. Other species, like Kittiwakes, which may engage in foraging or migration at night, are also susceptible to disorientation from artificial lighting, but this risk remains unassessed. The lack of site-specific night-time data creates a substantial gap in understanding ecological impacts.

Without a thorough evaluation of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites could be negatively affected. The necessary evidential standard to rule out adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and impeding lawful determination.

From a policy standpoint, this omission is at odds with the National Planning Framework 4, which pertains to the safeguarding of natural areas and environmental quality. It also undermines the overall analysis of landscape and seascape impacts, as the character of night-time environments is a vital component of the ecological setting.

In summary, the failure to assess dark skies and nocturnal wildlife leads to a significant

evidential void. The lack of baseline data, impact modelling, and detailed species-specific analysis renders the application incomplete and unfit for lawful determination.

TOURISM

The evaluation of tourism impacts is critically inadequate, neglecting to assess the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application recognises that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution.

Tourism has seen substantial growth, with income rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nevertheless, the application does not address how the industrialisation of the seascape and the resultant loss of environmental quality would affect Tourism Gross Value Added or broader economic resilience. Without this analysis, it remains unclear whether the proposed development would yield a net economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment neglects to consider the significance of environmental quality in bolstering tourism, particularly the role of unspoiled landscapes and dark skies in enhancing visitor experiences and tapping into emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a substantial gap in the understanding of impacts on a recognised and growing segment of the local economy.

In an island community with limited economic diversification, the failure to evaluate tourism impacts has broader consequences for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately appraised as stipulated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4, especially regarding economic impact and the necessity to illustrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and fails to furnish sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the inability to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and consider the island's economic dependencies culminates in a significant evidential gap. This hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements for sustainable development according to statutory duties, national policy, and evidential standards. It presents similar issues to those that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This current application is submitted under a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The application lacks a complete and reliable evidential basis for determination. There are significant gaps in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and key impact pathways that have been overlooked, such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism impacts. Consequently, the Environmental Impact Assessment is incomplete and does not provide a thorough understanding of the likely significant effects or residual impacts.

There are procedural issues as well. The absence of a compliant Island Communities Impact Assessment contravenes statutory duties under the Islands (Scotland) Act 2018, and not disclosing the 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, making the application unfit for determination.

Moreover, the proposal conflicts with National Planning Framework 4. It does not demonstrate the protection of biodiversity, natural places, or cultural heritage, fails to show acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to insufficient tourism impact modelling. The cumulative impact of both offshore and onshore elements has not been adequately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are uncertain and potentially significant. The assessments of 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 achieved, invoking the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

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

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

As a result, I formally request that the application for the Spiorad na Mara Offshore Wind Farm 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: 858855E3

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the applicable marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and its supporting documentation has revealed substantial deficiencies across material planning, environmental, cultural, and procedural aspects. The site of the proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The scale, proximity, and design of this proposal raise significant concerns about its compliance with statutory requirements, national policy, and the principles of sustainable development.

A lawful determination is not supported by the application, as it lacks an adequate evidential basis. There is a notable absence of critical environmental data, with limited and inconsistent baseline information. Furthermore, key elements of the proposal are undefined. The adoption of a flexible design framework hinders a clear understanding of the likely significant effects. Additionally, the reliance on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation does not facilitate a full or informed understanding of the environmental, cultural, or community impacts involved. Claims regarding negligible or non-significant effects lack robust evidential support.

Substantive policy conflicts are evident. The proposal 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. It has not satisfactorily demonstrated compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests necessary for consent and impair the capacity of the competent authority to ascertain whether the development is acceptable within policy frameworks.

The unprecedented scale of the proposal raises serious concerns, as large turbines are set to be positioned in close proximity to the shoreline, thereby impacting landscape capacity, visual dominance, and overall environmental integrity. In light of the insufficient information presented, the reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete. This renders it incapable of supporting a lawful determination. Therefore, in 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 reliable overview of the anticipated environmental effects of the proposal. The adoption of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty hampers the consistent application of a worst-case scenario, compromising the integrity of the assessment. As a result, the presented impacts may not accurately reflect the actual development, hindering both public understanding and the competent authority's ability to grasp the true extent of environmental effects.

The application places heavy reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. As such, consent is sought based on the premise that environmental harm will be managed later. This approach undermines any meaningful evaluation of effectiveness or assessment of residual impacts. Deferring critical information to post-consent stages is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

There are also notable evidential deficiencies, which include gaps in baseline data, limitations in methodology, and the use of assumptions rather than site-specific evidence. These issues lead to uncertainty about the scale and significance of impacts, especially where findings of negligible or non-significant effects are presented without robust supporting data. Insufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that is incompatible with statutory requirements.

Consequently, the application does not satisfy the evidential threshold needed under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This triggers the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to show compliance with National Planning Framework 4, which includes stipulations on biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been fully assessed or that appropriate safeguards are in place.

Overall, the reliance on an undefined design envelope, the lack of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and robust assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment regarding social impacts, health, and wellbeing is fundamentally flawed and lacks the necessary transparency for a lawful evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents; however, the comprehensive report has not been made available. This

creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full range of social risks highlighted by the developer's own research.

Evidence suggests that local residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct engagement and are not conjectural. Nonetheless, the absence of the full assessment restricts proper scrutiny of these findings, thus impairing the capacity to assess their significance in the decision-making process.

Additionally, the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. However, these impacts have not been adequately incorporated into the main application or given the necessary consideration. The non-disclosure of the complete Social Impact Assessment obscures the actual human and social costs associated with the development.

This lack of transparency fundamentally undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for projects of this magnitude, especially when there may be effects on community character and functionality. The failure to provide the complete dataset means the application does not offer a solid evidential foundation for evaluating the balance between benefits and detriments.

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

The procedural ramifications are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This constitutes a significant omission in the application, representing a failure to satisfy the evidential standards of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The 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.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks an evaluation of dark skies and nocturnal wildlife, which is a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism, particularly in relation to emerging sectors like astro-tourism. The introduction of permanent red aviation lighting, visible over long distances, would create an intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

Furthermore, the application does not address the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the importance of dark skies to the area's identity, this absence represents a serious gap in the overall landscape and environmental evaluation. Moreover, there is no analysis of the potential impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting due to their sensitivity to phototaxis, which can cause disorientation and increase the risk of collisions. The lack of any lighting impact assessment or phototaxis study means that potential effects on these species remain unexamined.

This situation is further exacerbated by reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activities and associated risks. For instance, Kittiwakes, which may forage or migrate at night, are at risk of disorientation from artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data creates a critical gap in understanding ecological impacts, making it impossible to ascertain whether protected species or designated sites might face adverse effects. The evidential standard required to exclude these potential adverse effects cannot be met, thereby engaging the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4, which emphasizes the protection of natural areas and environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the character of night-time environments is an essential aspect of the ecological framework. Collectively, the absence of assessments related to dark skies and nocturnal wildlife creates a significant evidential gap, resulting in an incomplete application that cannot support a lawful determination.

TOURISM

The evaluation of tourism impacts is significantly inadequate and does not address the economic and social repercussions for a vital component of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and prevailing sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it lacks a quantified assessment of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or overall economic contributions.

Tourism has experienced notable growth, rising from £65 million in 2017 to over £81.5

million, sustaining more than 1,000 jobs and representing up to 16% of the island's economy. In spite of this progress, the application does not simulate how the industrialisation of the seascape and the degradation of environmental quality could affect Tourism Gross Value Added or the broader economic resilience. Without such analysis, it remains unclear whether the development would provide a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the assessment neglects to consider the significance of environmental quality in fostering tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience, alongside emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this oversight, creating a substantial gap in the understanding of impacts on a recognised and flourishing segment of the local economy.

In an island community characterised by limited economic diversification, the lack of an assessment of tourism impacts carries broader implications for employment, local businesses, and community sustainability. The failure to produce a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately evaluated, as stipulated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impact and the necessity to exhibit net benefit. It also contradicts strategic objectives that designate tourism as a priority growth sector, failing to present sufficient evidence for the competent authority to evaluate the economic implications of the proposal.

In summary, the combined deficiencies in quantifying tourism impacts, analysing environmental drivers of visitor behaviour, and considering the island's economic dependency lead to a substantial evidential gap. This hinders a thorough evaluation of economic effects and culminates in the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development, as it does not align with statutory duties, national policy, or evidential standards. This application echoes the core issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, where the unacceptable scale of industrialisation was highlighted. Despite being presented under a stronger policy framework, which emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application lacks a thorough and reliable evidential basis.

Critical gaps in baseline data are evident, alongside the continued use of an undefined design envelope and an overreliance on unspecified mitigation measures. Key impact pathways, including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of the likely

significant effects and residual impacts.

There are also clear procedural failures associated with the proposal. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the lack of a full Social Impact Assessment represents a material omission. These deficiencies impede the competent authority from properly assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

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

Environmental risks remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals are internally inconsistent, and the evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, preventing a lawful conclusion that impacts are acceptable.

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

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

For these reasons, a formal request is made that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

This will be an eyesore and have little benefit to the local economy. If electricity prices were to decrease this might be a more attractive option to the local population. Is windpower really as eco friendly as it is made out to be? It is expensive to manufacture parts, they won't last forever and what happens once they are decommissioned?

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: EE178F10

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report and associated documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural integrity. The project is set to be located off the west side of the Isle of Lewis, a region renowned for its Atlantic-facing coastline, nearly untouched natural environment, and deep-rooted cultural identity. Concerns regarding the scale, proximity, and design of this development raise serious questions about its alignment with statutory requirements, national policies, and the core principles of sustainable development.

The application itself lacks an adequate evidential foundation necessary for a lawful determination. It is evident that critical environmental data is absent, baseline information is scarce and inconsistent, and several key facets of the proposal are still not clearly defined. Moreover, the use of a flexible design framework obscures the understanding of potential significant impacts, while the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the documentation fails to provide a complete or informed perspective on environmental, cultural, or community repercussions, leaving unsupported claims of negligible or non-significant effects.

There are notable and significant conflicts with established policy frameworks. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, particularly regarding biodiversity, natural landscapes, cultural heritage, and public health. It does not successfully illustrate compliance with national obligations to safeguard biodiversity, climate-related interests, and environmental integrity. Such conflicts fundamentally challenge the statutory tests necessary for consent and compromise the ability of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of this proposal poses additional concerns, with large turbines planned in close proximity to the shoreline, raising serious issues about landscape capacity, visual impact, and environmental consequences. Collectively, the lack of sufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and unable to facilitate a lawful decision. In light of these circumstances, it is essential that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is lacking in material detail and fails to offer a full, transparent, or reliable overview of the likely environmental effects associated with the proposal. The flexible Project Design Envelope introduces uncertainty, as it does not commit to specific turbine dimensions, layouts, or configurations. This uncertainty undermines the assessment's integrity, resulting in potential discrepancies between the impacts presented and the actual development constructed. Consequently, both the public and the competent authority are left without a clear understanding of the environmental effects.

Moreover, the application depends heavily on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the assumption that environmental harm will be managed later hinders any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent stages is not acceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established prior to any determination.

The report also exhibits serious evidential shortcomings, with gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. These issues generate uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are drawn without robust supporting data. A lack of sufficient information complicates a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that does not align with statutory requirements.

As a result, the application does not meet the evidential standards set by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not comply with the National Planning Framework 4, which includes requirements for biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies prevent a lawful and thorough assessment of environmental effects and mean that the competent authority lacks the necessary information to make a determination on the application.

ASSESSMENT OF ALTERNATIVES

The application presents a narrative account of project evolution rather than a structured and reasoned comparison of realistic alternatives based on environmental effects. This assessment is materially inadequate and does not meet the statutory requirements of the Environmental Impact Assessment regime. It fails to demonstrate that less harmful options have been properly identified, assessed, and selected over

more damaging solutions.

Furthermore, there is no transparent or evidence-based comparison of alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has seriously considered placing turbines further offshore, which would likely reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the crucial importance of proximity to shore in determining impact, the lack of such analysis obstructs any conclusion that the proposed siting represents the least damaging option.

This inadequacy also applies to cable routing and landfall assessment, as there is insufficient evidence that alternative routes have been explored to avoid or minimise impacts on sensitive receptors. Areas of cultural and spiritual significance, including Barvas Cemetery, are not adequately considered. The absence of a clear avoidance strategy and the lack of comparative analysis indicate that mitigation by design has not been employed; instead, there is an over-reliance on post-design mitigation measures.

Consequently, the application fails to show that environmental harm has been minimised through site selection, layout, and infrastructure routing. This signifies a failure to adhere to the established mitigation hierarchy and hampers the competent authority's ability to determine whether less harmful and more suitable alternatives exist. Without a robust assessment of alternatives, it cannot be concluded that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency undermines compliance with National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not been thoroughly assessed and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is fundamentally lacking and fails to offer a thorough understanding of ecological receptors in the West Lewis coastal environment. This area is not only highly sensitive but also biologically active. However, the baseline data provided is incomplete, and the methodologies used do not sufficiently capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

One significant shortfall pertains to otters, a European Protected Species. The application does not adequately recognise or assess their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns leaves unassessed the potential effects arising from construction disturbance, noise, and increased activity. This oversight weakens any conclusions drawn regarding the absence of significant effects on this species.

There are also notable deficiencies in the assessment of basking sharks, where the reliance on aerial surveys introduces considerable detection bias, particularly in Atlantic conditions. This methodology is likely to underestimate their presence, especially when compared to established land-based observations that indicate these waters are used frequently. The neglect to incorporate or adequately consider such data results in an incomplete baseline, thereby undermining the reliability of the conclusions presented.

These methodological shortcomings mean that any conclusions suggesting negligible or non-significant effects are grounded in assumptions rather than on robust evidence. The lack of sufficient baseline data hinders meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the actual scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria outlined in the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to properly identify or assess protected species. The uncertainty introduced by these omissions prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. In light of these circumstances, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions results in an unreliable assessment. These deficiencies obstruct a robust evaluation of the impacts on marine ecology and protected species and lead to the overarching conclusion that the application is devoid of a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents several deficiencies that significantly undermine its conclusions. The assessment fails to convincingly demonstrate that internationally important seabird populations on the west coast of the Isle of Lewis, many of which are in decline, will not be adversely affected by the proposed development. This area includes key foraging zones and migratory pathways, yet the implications of potential displacement, collision risk, and habitat loss are not adequately evaluated.

There is a fundamental contradiction in the application, where the developer claims no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment, suggesting that the conclusions drawn are not backed by sound evidence. Furthermore, the assessment does not provide adequate proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It fails to account for the critical importance of these feeding grounds, and the use of modelling techniques introduces

uncertainty, especially for species in severe decline like Kittiwakes and Fulmars. The methodologies applied may underestimate mortality rates, particularly where baseline data is lacking and behavioural responses are not fully understood.

The siting of turbines within a known migratory corridor introduces a significant risk, effectively acting as a barrier in a primary flight path used by birds travelling between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of sustained mortality in this corridor or the potential impacts on species with small global populations.

Regulatory standards are not met, as the application fails to provide the necessary evidence to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been reached. This situation engages the precautionary principle and prevents a lawful conclusion that would support consent.

Collectively, these deficiencies signify a lack of compliance with the 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 negatively impacted puts the proposal at odds with national policy. Overall, the assessment is unreliable due to internal inconsistencies, methodological flaws, and insufficient evidence, which hinder a thorough evaluation of the impacts and lead to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity along the West Lewis coastline, which is a living cultural landscape where environment, language, tradition, and community are deeply interconnected. The application adopts a reductive perspective, treating heritage merely as isolated, static assets, rather than acknowledging their ongoing social, cultural, and spiritual significance within the community.

Notably, the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas is a key deficiency. These sites serve as active places of burial and spiritual practice; however, they are classified as static features in the assessment. This oversight neglects their continued use and the implications of development on their surroundings. As a result, the evaluation of cultural effects is incomplete, dismissing their vital role in community life.

Additionally, the assessment disregards intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These elements are fundamental to the area's identity, yet they are entirely overlooked, creating a significant gap in understanding the true cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population holds a unique cultural identity with characteristics recognized for Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to honour established principles of participation in matters affecting cultural and environmental interests.

A further critical procedural failure is the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission is enough to render the determination unlawful.

From a policy standpoint, the inadequacies in the application place it in direct conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to account for both tangible and intangible heritage, and the neglect of living cultural practices, signifies a clear violation of policy requirements.

Ultimately, the collective failure to evaluate living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development remain improperly assessed, and the application lacks a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full report of the Social Impact Assessment commissioned by the developer has not been published, creating a significant evidential gap. This lack of transparency means that both the public and the competent authority cannot grasp the complete scope of social risks identified through the developer's own research. Available summaries suggest that residents are facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement with the community and are therefore based on actual experiences rather than speculation. However, without access to the full assessment, proper scrutiny of these findings is hindered, limiting the ability to evaluate their importance in the decision-making process.

Furthermore, the proposal is seen as a threat to community identity and cohesion, with the developer's own findings highlighting concerns about "cultural loss." Despite this, such impacts have not been fully considered in the main application or given adequate weight. The withholding of the complete Social Impact Assessment obscures the true human and social costs of the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning may be at stake. By failing to provide the complete dataset, the application

lacks a solid evidential basis for balancing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. Development is expected to promote positive health outcomes and prevent harm, yet the evidence available points to existing adverse effects that have not been fully revealed. Without the complete assessment, the application cannot prove compliance with this policy.

The procedural implications are serious. The competent authority cannot carry out a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a significant omission within the application and fails to meet the evidential requirements of the Environmental Impact Assessment regime.

Overall, the non-disclosure of the complete Social Impact Assessment, along with evidence of existing negative impacts, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and its undeveloped nature, evoking a strong sense of remoteness. The assessment of seascape, landscape, and visual impacts in the application is materially deficient, failing to adequately represent the scale of change or the sensitivity of this unique environment. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence that would fundamentally alter this character, resulting in a permanent and irreversible transformation of the landscape.

The application does not fully capture the magnitude of the visual change. The scale and proximity of the turbines mean they would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. The assessment inadequately conveys this level of impact and its significance within such a sensitive landscape.

Methodological issues are evident regarding the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This risk of understatement undermines the reliability of the visual impact assessment.

A significant oversight is the failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Iconic sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. Instead of recognising their interdependence, the assessment treats these assets in isolation, resulting in an

incomplete understanding of the impacts on their setting and cultural significance.

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

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

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

Moreover, there is uncertainty concerning the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. The lack of robust modelling and well-defined management strategies means that it is impossible to ascertain the extent, duration, or ecological consequences of these potential impacts. This uncertainty also extends to the possible effects on marine species and habitats

that have already been identified as sensitive within the broader assessment.

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

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

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

FISHERIES AND MARINE LIFE

The assessment of fisheries and marine life presented in this application is inadequate and fails 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 alongside a vital fishing industry, yet the application does not convincingly demonstrate that these uses and habitats can be preserved without causing considerable disruption.

A significant concern arises from the assumption that fishing activities can be relocated without repercussions. There is no supporting evidence that alternative fishing grounds are not only available but also accessible and capable of absorbing additional pressure. This critical gap poses a risk of overfishing in other areas, which could lead to detrimental economic consequences for the local fishing fleet. In the absence of a clear, evidence-based assessment, the effects on fisheries and the livelihoods they support remain unclear.

Moreover, the proposal brings with it considerable risks to marine species, particularly due to the underwater noise associated with construction. The use of high-energy hammer piling over an extended period is likely to create disturbances over large distances, impacting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises urgent concerns, yet these effects are minimised in the application without sufficient supporting evidence.

There is a troubling inconsistency within the application, where the necessity for licences to allow harm to European Protected Species is acknowledged, while simultaneously downplaying the impacts as negligible. This contradiction undermines the assessment's credibility and raises serious issues regarding compliance with the Habitats Regulations, particularly where anticipated harm requires legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts stemming from various pressures, such as habitat disturbance, noise, and the displacement of fishing activity. A comprehensive evaluation of these combined effects is essential to understand the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is significantly lacking and does not adequately account for the full range of impacts from what constitutes a single integrated project. The offshore turbines and the onshore works are fundamentally interconnected; however, their separate assessments lead to a disjointed evaluation, obscuring the true magnitude of environmental and socio-economic consequences.

Key onshore components entail cabling across protected moorland, the construction of a substation near Stornoway, and the development of associated access infrastructure through sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive area. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

The lack of consideration for onshore impacts obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be reviewed together. The disjointed evaluation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not fully realised. There are considerable risks to sensitive habitats, including machair systems and peatland environments, which benefit from policy protection. The application does not sufficiently demonstrate that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been considered, creating a significant evidential void regarding biodiversity protection.

Concerns also arise regarding carbon balance, as the disturbance of peatland can lead to the release of stored carbon, potentially resulting in a carbon debt that undermines the objectives of renewable energy development. This issue has not been adequately addressed by the application, nor has it been shown that the overall carbon balance remains advantageous. Furthermore, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence that the requisite consents or processes have been initiated, raising doubts about deliverability and lawful implementation.

From a policy standpoint, the failure to evaluate the project in its entirety and to demonstrate protection of peatlands, habitats, and land use interests is inconsistent with the National Marine Plan and the National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application. Collectively, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this portion of the application incomplete and unreliable, thus obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife represents a critical gap within the Environmental Impact Assessment. The coastline of West Lewis is renowned for its exceptionally dark skies, which are essential for environmental quality, cultural identity, and tourism, particularly in relation to the growing sector of astro-tourism. The proposal introduces permanent red aviation lighting that would be visible over vast distances, creating an intrusive “wall of light” across the western horizon and fundamentally changing the night-time environment.

Moreover, the application fails to evaluate the implications of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly concerning given the significance of dark skies to the identity of the area. The lack of consideration for these impacts leads to a considerable gap in the overall assessment of the landscape and environment.

More alarmingly, there is no examination of how the proposed lighting will affect nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly vulnerable to artificial lighting due to their phototactic behaviour, which can cause disorientation and increase the risk of collisions. The application lacks any lighting impact assessment or phototaxis study, resulting in a failure to evaluate how the aviation lighting might impact these species or contribute to increased mortality rates.

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

impacts involved.

Without a thorough assessment of nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites could be adversely impacted. The necessary evidential standard needed to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, thus invoking the precautionary principle and hindering lawful determination.

From a policy perspective, this omission contradicts the National Planning Framework 4 concerning the protection of natural spaces and the maintenance of environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the character of night-time environments is a vital aspect of the natural setting.

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

TOURISM

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

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

Moreover, the assessment overlooks the crucial role that environmental quality plays in supporting tourism, particularly the significance of unspoiled landscapes and dark skies for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further highlights this shortcoming and creates a substantial gap in understanding the impacts on a recognised and expanding part of the local economy.

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to adhere to the principles of sustainable development as required by statutory obligations, national policy, and evidential standards. This application presents the same core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. It is now submitted under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are substantial deficiencies in the evidential basis provided for this application. Critical gaps exist in baseline data, and the use of an undefined design envelope raises concerns. The application relies on unspecified mitigation measures and fails to account for significant impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment lacks completeness and does not facilitate a comprehensive understanding of potential significant effects or residual impacts.

Moreover, there are evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as per the Islands (Scotland) Act 2018. Furthermore, the failure to present a complete Social Impact Assessment is a notable omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal stands in direct opposition to National Planning Framework 4. It fails to provide assurances for the protection of biodiversity, natural environments, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable, nor can it substantiate a net economic benefit due to missing tourism impact modelling. The cumulative effects of both offshore and onshore elements remain improperly assessed, which obscures potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. Assessments of marine

ecology, seabirds, protected species, and marine mammals are either incomplete or internally inconsistent. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

Collectively, the application is both procedurally and substantively unfit for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks obstructs a lawful, evidence-based decision. The competent authority must either refuse consent on these grounds or invoke the appropriate regulatory provisions to mandate the submission of the missing information.

Therefore, I formally request that the application for the Spiorad na Mara Offshore Wind Farm be rejected in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 290112FE

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.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate, failing to deliver a comprehensive, transparent, or trustworthy overview of the potential environmental repercussions of the proposal. The employment of a flexible Project Design Envelope, which lacks a commitment to precise turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty hampers a consistent assessment based on worst-case scenarios, thereby compromising the integrity of the evaluation. As a result, the potential impacts outlined may not accurately represent the development that will ultimately be realised, leaving both the public and the competent authority unaware of the true magnitude of the environmental effects.

The application leans significantly on mitigation strategies, monitoring plans, and management approaches that remain undefined. Consent is being sought under the assumption that any environmental damage will be addressed later, which hinders any substantial evaluation of the effectiveness of these measures or an assessment of residual impacts. This postponement of crucial information until after consent is granted is procedurally unacceptable and contradicts the essential aims of the Environmental Impact Assessment process, which mandates that significant potential effects and mitigation measures should be clearly established before any determination can be made.

There are also marked evidential shortcomings, encompassing gaps in baseline data, methodological limitations, and a reliance on assumptions rather than specific site-related evidence. This leads to uncertainties regarding both the scale and significance of the impacts, particularly where conclusions suggest negligible or non-significant effects without robust supporting information. The lack of adequate data obstructs a clear comprehension 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 outlined in the Habitats Regulations, which necessitate the exclusion of adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal falls short of demonstrating alignment with the National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it is not possible to confirm that impacts have been thoroughly evaluated or that suitable safeguards have been established.

Overall, the dependence on an unspecified design envelope, the lack of defined mitigation strategies, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies prevent a lawful and rigorous assessment of environmental effects, resulting in the competent authority being unable to make an informed decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

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

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species lacks completeness and reliability, failing to provide an accurate understanding of the ecological receptors in the West Lewis coastal environment. This area is recognised as a highly sensitive and biologically active marine system, yet the baseline data is insufficient. The methodologies employed in the assessment do not adequately capture the presence, behaviour, and habitat utilisation of species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

One significant gap in the assessment concerns otters, classified as a European

Protected Species. The application does not appropriately recognise or evaluate their active use of coastal regions for foraging and movement. The omission of crucial factors such as their core foraging range and behavioural patterns undermines the assessment of potential effects arising from construction disturbances, noise, and heightened activity. This oversight diminishes the validity of any conclusions regarding the absence of significant impacts on this species.

Furthermore, there are notable deficiencies in the evaluation of basking sharks. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions, which is likely to lead to an underestimation of their presence. This situation is compounded by established land-based observations that indicate frequent use of these waters. The failure to adequately consider this data results in an incomplete baseline, thereby weakening the reliability of the conclusions drawn.

Due to these methodological shortcomings, the conclusions asserting negligible or non-significant effects appear to be based more on assumptions than on robust evidence. Additionally, the lack of sufficient baseline data hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This leads to uncertainty about the true risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the criteria set out by the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been duly identified or assessed. The introduced uncertainty hinders the ability to rule out adverse effects beyond reasonable scientific doubt, thereby invoking 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 shortcomings prevent a thorough 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 significant seabird populations, many of which are already in decline. Despite this, the application does not adequately demonstrate that these species will not face adverse effects from the proposed development. The site is situated within critical foraging areas and migratory routes, yet the ornithological assessment fails to thoroughly evaluate potential risks such as displacement, collision, and habitat loss.

A serious inconsistency is present in the application, where the developer claims there will be no significant adverse effects while also advancing a Habitats Regulations derogation case, which should only be necessary if significant harm is anticipated. This contradiction undermines the reliability of the assessment and raises doubts about the

support that exists for its conclusions based on the underlying evidence.

Furthermore, the assessment does not provide adequate proof that seabirds linked to protected areas like the Lewis Peatlands and St Kilda will remain unaffected. The crucial nature of these feeding grounds is not sufficiently acknowledged, and the reliance on modelling introduces uncertainty, particularly for declining species such as Kittiwakes and Fulmars. The methodologies employed may underestimate mortality rates due to incomplete baseline data and a lack of understanding regarding species' behavioural responses.

The placement of turbines in a recognised migratory corridor poses a significant risk, creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently consider the long-term consequences of continuous mortality within this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application fails to meet the necessary evidential threshold to assert that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, combined with gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and renders a lawful conclusion in favour of consent unattainable.

These identified deficiencies also signify a breach of National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The failure to conclusively demonstrate that internationally important seabird populations will not be adversely affected places the proposal in opposition to national policy.

In summary, the assessment is unreliable due to its internal inconsistencies, methodological shortcomings, and lack of sufficient evidence. These issues hinder a rigorous evaluation of the impacts, leading to the overall conclusion that the application does not satisfy the statutory requirements essential for 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 presents significant deficiencies in its assessment of seascape, landscape, and visual impacts, failing to adequately address the sensitivity of the environment and the scale of change anticipated. The West Lewis coastline, characterised by an open Atlantic horizon, an undeveloped character, and a profound sense of remoteness, would be fundamentally altered by the introduction of large-scale turbines in close proximity to the shoreline. This would create a continuous and dominant industrial presence, resulting in a permanent and irreversible transformation of the landscape.

The application does not effectively convey the magnitude of the visual changes that would arise. The turbines would dominate views from residential areas, historic sites,

and frequently visited coastal locations, thereby impacting visual amenity and undermining the defining qualities of naturalness and remoteness. There is a concerning lack of clarity regarding the level of impact and its significance within the context of such a sensitive landscape.

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

Moreover, there is a failure to adequately consider the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting, linked visually and spatially to the Atlantic horizon. The assessment treats these heritage assets as isolated, neglecting their interdependence and leading to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these vital relationships, changing the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This represents a visual impact as well as broader cultural and spatial harm that has not been sufficiently addressed in the application.

From a policy standpoint, the proposal contravenes National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of proposed changes is incompatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the absence of a comprehensive worst-case assessment further undermines any assertions of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of the construction and pollution risks associated with the proposal is insufficient and lacks the necessary detail to evaluate the potential environmental impacts adequately. The project entails extensive seabed preparation and installation works in a high-energy Atlantic environment, yet it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead,

the application relies on mitigation and contingency measures that are to be developed after consent, which impedes any meaningful assessment of their adequacy or effectiveness.

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

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

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

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be assessed before granting consent, and the absence of such information renders a lawful determination impossible. Furthermore, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application under consideration presents a significant concern regarding the assessment of fisheries and marine life, which is inadequate and lacks a thorough evaluation of both ecological and socio-economic impacts. The coastal waters off West Lewis are home to a rich marine ecosystem and support an active fishing industry; however, the proposal does not provide evidence that these essential uses and habitats can be preserved or maintained without notable disruption.

A critical shortcoming lies in the presumption that fishing activities can be displaced

without repercussions. The application fails to substantiate claims that there are alternative fishing grounds available, accessible, and able to accommodate any additional pressure. This lack of evidence is crucial, as displacement of fishing efforts could lead to overfishing in other areas and create broader economic ramifications for the local fishing fleet. Consequently, without a well-supported assessment, the potential impacts on fisheries and the livelihoods dependent upon them remain inadequately understood.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise associated with construction activities. The use of high-energy hammer piling over extended durations is expected to disturb marine life over extensive distances, including species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises alarming issues, yet the application diminishes the importance of these potential effects without providing sufficient evidence.

Inconsistencies within the application further exacerbate concerns. While there is an acknowledgment of the necessity for licenses to permit harm to European Protected Species, the impacts are concurrently described as negligible. This contradiction not only undermines the credibility of the assessment but also raises doubts about compliance with the Habitats Regulations, especially in instances where anticipated harm would require legal authorisation.

The assessment also neglects to account for cumulative impacts resulting from multiple pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. An absence of a comprehensive evaluation regarding these cumulative effects hinders the ability to ascertain the overall implications for 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 falls short of showing that the development can coexist with current marine users or that it can avoid unacceptable impacts on marine biodiversity, thus obstructing any conclusion that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment regarding onshore infrastructure is fundamentally lacking and does not adequately address the full range of impacts arising from what constitutes a singular integrated project. The offshore turbines and the onshore works are inherently interconnected; however, they are evaluated independently, leading to a fragmented analysis that conceals the true extent of environmental and socio-economic

repercussions.

The onshore components encompass the installation of cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the creation of associated access infrastructure through delicate landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, a significant carbon reservoir and ecologically important habitat. The application fails to deliver a thorough evaluation of these consequences, thus hindering a complete understanding of the project's overall environmental impact.

By omitting or postponing the assessment of onshore impacts, the application obstructs a proper analysis of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; nevertheless, the delineation of offshore and onshore elements results in an incomplete comprehension of the combined effects on peatlands, habitats, and local communities.

Additionally, there are considerable risks posed to sensitive habitats, including machair systems and peatland environments, which are designated for policy protection. The application does not establish that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, creating a significant evidential deficiency in the context of biodiversity protection.

Concerns also arise regarding the carbon balance implications of the proposal. The disturbance of peatland results in the release of stored carbon, potentially creating a carbon debt that contradicts the goals of renewable energy development. The application inadequately addresses this concern or fails to demonstrate that the overall carbon balance remains advantageous.

Furthermore, the routing of infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application does not furnish evidence that the necessary consents or procedural steps have been commenced, raising doubts about both the feasibility and lawful execution of the project.

From a policy standpoint, the failure to evaluate the project in its entirety and to confirm protection for peatlands, habitats, and land use interests is at odds with the National Marine Plan and the National Planning Framework 4. The inability to show that impacts can be circumvented or mitigated further diminishes the application's credibility.

In summary, the separation of project elements, the lack of a comprehensive assessment, and the absence of evidence pertaining to environmental and land use impacts render this section of the application deficient and untrustworthy, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of evaluation concerning nocturnal wildlife and dark skies within the Environmental Impact Assessment is a significant oversight that warrants urgent attention. 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 introduction of permanent red aviation lighting will create a long-reaching and intrusive "wall of light" effect across the western horizon, thereby fundamentally transforming the night-time environment.

Moreover, the application fails to assess how this lighting will impact visual amenity, landscape character, and the experiences of residents and visitors. This neglect is particularly concerning as dark skies play a crucial role in the identity of the area and in emerging tourism sectors, such as astro-tourism. Consequently, the failure to address these impacts represents a significant gap in the overall landscape and environmental assessment.

Equally alarming is the absence of an evaluation regarding the effects on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting, which can lead to disorientation and a higher risk of collisions. The application does not provide any assessment of lighting impacts or a phototaxis study, thus neglecting the potential consequences of aviation lighting on these species and the likelihood of increased mortality.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture night-time activity and associated risks. Other species, including Kittiwakes, may forage or migrate during the night and are similarly at risk of disorientation from artificial light, yet this threat remains unassessed. The absence of site-specific night-time data results in a critical deficiency in understanding the ecological impacts.

Without a thorough examination of nocturnal effects, it is impossible to ascertain whether protected species or designated sites might suffer adverse consequences. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt cannot be achieved, invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission is at odds with the National Planning Framework 4, which aims to protect natural places and environmental quality. Furthermore, it undermines the comprehensive evaluation of landscape and seascape impacts, as the character of the night-time environment is a vital component of the overall ecosystem.

Taken as a whole, the failure to assess dark skies and nocturnal wildlife creates 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.

TOURISM

The application acknowledges that 86% of visitors to the Isle of Lewis are attracted by scenery, yet it fails to provide a quantified assessment of how large-scale offshore infrastructure may impact visitor numbers, behaviour, or the overall economic contribution from tourism. This sector relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Despite tourism's growth, from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for up to 16% of the island's economy, the assessment neglects to model the potential effects of industrialisation on the seascape and loss of environmental quality on Tourism Gross Value Added and broader economic resilience.

Furthermore, the application does not consider the essential role of environmental quality in sustaining tourism. The importance of unspoiled landscapes and dark skies for visitor experiences is particularly relevant to emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, resulting in a significant gap in understanding the impacts on a key aspect of the local economy.

In a community with limited economic diversification, the inadequate assessment of tourism impacts carries broader implications for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been adequately evaluated, which is a requirement under the Islands (Scotland) Act 2018.

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

Overall, the failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and consider the island's economic dependency results in a substantial evidential gap. This lack of analysis hinders a robust evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development when evaluated against statutory obligations, national policies, and evidential standards. The application revisits core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new proposal is being considered under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis provided for the determination of this application. Critical gaps in baseline data exist, alongside the continued use of an undefined design envelope, reliance on unspecified mitigation measures, and the

exclusion of essential impact pathways, including effects on nocturnal wildlife, comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, preventing a thorough understanding of the likely significant effects or any residual impacts.

Furthermore, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands (Scotland) Act 2018, and the failure to present a complete Social Impact Assessment constitutes a significant omission. Such deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal contradicts the National Planning Framework 4 by failing to demonstrate the protection of biodiversity, natural spaces, and cultural heritage. It does not adequately address health and wellbeing impacts and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. Additionally, the cumulative effects of both offshore and onshore components have not been appropriately assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertain and potentially significant environmental risks persist, as assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt remains unmet, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

I'm very scared for the wildlife, both on land and at sea, and of the impact this development will have on them. I don't believe a proper assessment has been carried out on the environmental impact this will have.

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: 33E2F770

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted within the relevant marine licensing and Environmental Impact Assessment frameworks. The development is situated off the west side of the Isle of Lewis, an area known for its stunning Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns regarding the scale, proximity, and design of the proposal highlight its incompatibility with statutory requirements, national policy, and the principles of sustainable development.

The application presents significant deficiencies, particularly an inadequate evidential basis for lawful determination. Key environmental data is notably absent, while baseline information remains limited and inconsistent. Furthermore, many aspects of the proposal are not clearly defined. The use of a flexible design framework obscures a comprehensive understanding of the potential significant effects, and the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation falls short of providing a complete understanding of environmental, cultural, or community impacts, leaving claims of negligible or non-significant effects unsupported by credible evidence.

Substantial policy conflicts are evident, as the proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, cultural heritage, natural places, and health and wellbeing. It does not sufficiently demonstrate that national obligations to safeguard biodiversity, climate interests, and environmental integrity are achievable. These discrepancies directly challenge the statutory tests necessary for consent, undermining the competent authority's capacity to deem the development acceptable according to policy standards.

The unprecedented scale of the proposal, with large turbines positioned in close proximity to the shoreline, raises significant worries about landscape capacity, visual dominance, and environmental consequences. Collectively, the insufficient information, reliance on undefined mitigation measures, evidential deficiencies, and clear non-compliance with policy indicate that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents a materially deficient analysis and lacks a complete, transparent, or reliable evaluation of the likely environmental effects associated with the proposal. The introduction of a flexible Project Design

Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations, creates significant uncertainty. This uncertainty hinders the consistent application of a worst-case scenario, thereby compromising the assessment's integrity. As a result, the impacts outlined may not accurately reflect the final development, preventing both the public and the competent authority from fully understanding the true extent of the environmental effects.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. This approach seeks consent under the premise that any environmental harm will be addressed at a later stage, obstructing any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. Such a deferral of critical information to post-consent phases is procedurally unacceptable and contradicts the fundamental objectives of the Environmental Impact Assessment regime, which stipulates that significant effects and mitigation should be clearly established before any determination is made.

Additionally, there are notable evidential deficiencies, including gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This results in uncertainties concerning the scale and significance of impacts, especially where 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 and introduces scientific uncertainties that cannot be aligned with statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, particularly in relation to biodiversity protection and environmental integrity, as it fails to show 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 specific mitigation measures, and the gaps in baseline data all contribute to rendering the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings impede a lawful and robust assessment of environmental effects and leave the competent authority unable to make an informed decision based on the information currently available.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate, failing to provide a thorough understanding of the ecological receptors in the West Lewis coastal environment. This marine system is both sensitive and biologically active, yet the baseline data is insufficient, and the methodologies applied do not effectively capture the presence, behaviour, and habitat use of species. Consequently, the assessment

lacks a solid evidential foundation for evaluating impacts.

A critical oversight is the treatment of otters, a European Protected Species, where the application inadequately recognises and assesses their use of coastal areas for foraging and movement. The failure to account for their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity have not been thoroughly evaluated. This significantly undermines the conclusions regarding the absence of notable effects on this species.

There are further shortcomings in the assessment of basking sharks, as the reliance on aerial surveys introduces significant detection bias, particularly in Atlantic conditions. This approach is likely to underestimate their presence, especially in light of established land-based observations that indicate frequent usage of these waters. By not incorporating or properly considering such data, the assessment presents an incomplete baseline and diminishes the reliability of its conclusions.

These methodological deficiencies lead to conclusions of negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of sufficient baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns regarding the true extent of risks faced by marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been adequately identified or assessed. The uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these factors, consent cannot be legally granted.

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 and underscore the conclusion that the application is lacking a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application raises significant concerns regarding its compliance with the evidential requirements for assessing impacts on biodiversity, particularly concerning internationally important seabird populations along the west coast of the Isle of Lewis. These populations are already in decline, and the application fails to demonstrate, to the necessary evidential standard, that these species will remain unaffected. The development is situated within critical foraging areas and migratory pathways, yet the assessment inadequately evaluates potential risks associated with displacement, collision, and habitat loss.

Furthermore, the conclusions drawn by the developer are fundamentally contradictory. While asserting that no significant adverse effects will occur, the application simultaneously puts forward a Habitats Regulations derogation case, which is only required if significant harm is anticipated. This inconsistency undermines the reliability of the ornithological assessment, indicating that the conclusions are not sufficiently supported by the evidence presented.

The assessment falls short in providing adequate evidence regarding the seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda. The critical nature of these feeding grounds is not thoroughly considered, and the reliance on modelling techniques raises uncertainties, especially for species that are in severe decline, like Kittiwakes and Fulmars. The methods employed are likely to underestimate mortality rates, particularly where baseline data is lacking and the behavioural responses of these species are not fully understood.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally lacking, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are closely intertwined. Instead of acknowledging the ongoing social, cultural, and spiritual functions of heritage, the application adopts a reductive perspective, viewing heritage merely as a collection of isolated and static assets.

A significant shortcoming in the assessment is its treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices, yet they are classified as static features within the assessment. This misrepresentation overlooks their ongoing significance and the effects development may have on their surroundings. Consequently, the evaluation of cultural impacts remains incomplete, disregarding the cemeteries' role within community life.

Moreover, the application neglects to consider intangible cultural heritage, which encompasses the Gaelic language, various traditions, and the enduring connection between the community and the coastal environment. These aspects are crucial to the area's identity but have been entirely overlooked in the assessment, representing a major oversight. Without taking these factors into account, it is impossible to fully grasp the cultural implications of the proposed development.

Concerns regarding community rights and engagement further exacerbate the situation. The Gaelic-speaking population embodies a distinct cultural identity with recognised characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. The lack of meaningful engagement diminishes the credibility of the assessment and fails to honour established principles of participation for decisions that impact cultural and environmental interests.

Another critical oversight is the absence of a compliant Island Communities Impact Assessment, a legal requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission alone renders the determination process unlawful.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The failure to consider both tangible and intangible heritage, alongside the disregard for living cultural practices, indicates a clear violation of policy directives.

In summary, the failure to adequately assess living heritage, intangible cultural values, community rights, and statutory requirements has resulted in a notable evidential gap. The cultural impacts of the proposed development have not been thoroughly evaluated, leaving the application without a solid foundation for determining the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding seascape, landscape, and visual impacts is insufficient and does not capture the extent of change or the sensitivity of the surrounding environment. The coastline of West Lewis features an open Atlantic horizon, an undeveloped character, and a notable sense of remoteness. The close placement of large-scale turbines to the shoreline would introduce a continuous industrial presence, fundamentally changing this character and resulting in an irreversible transformation of

the landscape.

The application fails to accurately depict the magnitude of visual change that would occur. Due to the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively affect visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not sufficiently convey the significance of this impact within the context of such a delicate landscape.

Concerns also arise regarding the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially concerning important cultural heritage sites and high-value landscapes. This raises the possibility that the extent of visual impact has been underestimated, thereby compromising the assessment's reliability.

Moreover, there is a lack of evaluation of the interconnectedness of landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these heritage assets as isolated, failing to acknowledge their interdependence, which leads to an incomplete understanding of impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the preservation of natural places and historic assets. The scale of change contradicts the need to maintain landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of policy compliance.

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

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

FISHERIES AND MARINE LIFE

The assessment concerning fisheries and marine life lacks the necessary detail and fails to provide a thorough evaluation of the ecological or socio-economic impacts associated with the proposal. The waters off the West Lewis coast are home to both a diverse marine ecosystem and a significant fishing industry. However, the application does not sufficiently demonstrate how these uses and habitats can be preserved or maintained without causing considerable disruption.

One major concern is the assumption made within the application that fishing activity can be displaced without any repercussions. There is a lack of evidence supporting the availability, accessibility, or capacity of alternative fishing grounds to accommodate the additional pressure that such displacement would create. This oversight is critical, as it poses risks of overfishing in other locations and may have broader economic ramifications for the local fishing fleet. A clear and evidence-based assessment is essential for understanding the potential impacts on fisheries and the livelihoods that depend on them.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise produced during construction activities. The use of high-energy hammer piling over a prolonged duration is expected to disturb a wide area, affecting species such as dolphins. The anticipated disturbance to a considerable portion of the local bottlenose dolphin population is a serious issue; however, the application minimizes the importance of these effects without adequate supporting evidence.

In addition, the application reveals a notable inconsistency. While it acknowledges the requirement for licences to allow harm to European Protected Species, it simultaneously describes the anticipated impacts as negligible. This contradiction raises doubts about the reliability of the assessment and brings into question its adherence to the Habitats Regulations, especially when harm is expected to a degree that necessitates legal authorisation.

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

From a policy standpoint, the application fails to demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, thus hindering any conclusion regarding the sustainability of the proposal.

Overall, the absence of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment contribute to an incomplete and unreliable evaluation. These shortcomings prevent a comprehensive understanding of the implications for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal's separation of offshore turbines and onshore works results in a materially incomplete assessment, failing to fully account for the integrated nature of the project. This fragmented approach obscures the true scale of the environmental and socio-economic impacts, as the onshore elements, which include cabling across protected moorland and the construction of a substation near Stornoway, are not adequately assessed alongside their offshore counterparts.

Significant concerns arise from the construction activities, particularly the excavation across areas of deep peat within Barvas Moor. This region is a crucial carbon store and ecologically sensitive habitat, yet the application lacks a comprehensive evaluation of these impacts. Consequently, it prevents an accurate understanding of the project's overall environmental footprint.

By deferring the assessment of onshore impacts, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered together, and the current separation hampers a complete understanding of the combined impacts on peatlands, habitats, and local communities.

Sensitive habitats, including machair systems and peatland environments, face significant risks that are not fully addressed. The application does not adequately demonstrate that impacts on these protected areas have been assessed or that suitable avoidance measures have been implemented, which highlights a clear evidential gap regarding biodiversity protection.

Furthermore, the disturbance of peatland raises serious concerns about the carbon balance. Disturbing these areas releases stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy development. The application provides insufficient detail on this matter or assurance that the overall carbon balance remains favourable.

The routing of infrastructure through active croft land presents additional challenges, introducing potential conflicts with existing land use and legal rights. There is no evidence provided that the necessary consents or processes have been initiated, thereby raising questions about the deliverability and lawful implementation of the project.

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

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

TOURISM

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

This sector has experienced substantial growth, with its value rising from £65 million in 2017 to over £81.5 million, thereby supporting in excess of 1,000 jobs and constituting up to 16% of the island's economy. Despite this impressive growth, the application does not model the potential impacts of industrialisation on the seascape or the anticipated decline in environmental quality on Tourism Gross Value Added or broader economic resilience. As a result, it remains unclear whether the proposed development would yield a net economic benefit or detract from an established and thriving industry.

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

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

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

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

SUMMARY

The 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.

Additional Comments

One unspoilt sanctuary will be ruined

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: 985EAD6A

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

Dear Sir/Madam

This letter is a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under relevant marine licensing and Environmental Impact Assessment regimes. The objection is based on a review of the Environmental Impact Assessment Report and supporting documents, highlighting material deficiencies in 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. Concerns arise regarding the compatibility of the scale, proximity, and design of the proposal with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis for lawful determination. It contains missing critical environmental data, and the baseline information provided is limited and inconsistent. Key aspects of the proposal are not clearly defined. The flexible design framework inhibits a clear understanding of likely significant effects, while unspecified mitigation measures prevent any assessment of their effectiveness. Consequently, the documentation fails to provide a full or informed understanding of environmental, cultural, or community impacts. Claims of negligible or non-significant effects are not backed by robust evidence.

There are clear policy conflicts evident in the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural 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 relate to the statutory tests for consent and hinder the competent authority's ability to conclude that the development is acceptable in policy terms.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The proposed development is accompanied by an Environmental Impact Assessment Report that is fundamentally lacking, failing to deliver a comprehensive, transparent, or dependable evaluation of the expected environmental impacts. The flexible Project

Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty and hinders the ability to apply a worst-case scenario consistently. This diminishes the integrity of the assessment, leaving both the public and the competent authority without a clear understanding of the actual environmental effects of the development that may ultimately be constructed.

The application leans heavily on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. Seeking consent under these conditions implies that any environmental damage will be addressed only after approval, inhibiting a meaningful evaluation of their effectiveness or the assessment of residual impacts. This postponement of essential information to stages following consent is not procedurally acceptable and contradicts the aims of the Environmental Impact Assessment framework, which stipulates that likely significant effects and mitigation strategies must be clearly defined before any determination.

Additionally, the application is marred by substantial evidential deficiencies, including missing baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These shortcomings result in uncertainty concerning the scale and significance of impacts, particularly where claims of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obstructs a comprehensive understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be aligned with statutory obligations.

As a result, the application does not satisfy the evidential threshold established under the Habitats Regulations, which requires the exclusion of adverse effects beyond reasonable scientific doubt. This raises concerns under the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to the National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been thoroughly assessed or that appropriate safeguards are in place.

Overall, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data contribute to rendering the Environmental Impact Assessment Report incomplete and unreliable. These deficiencies obstruct a lawful and thorough assessment of environmental impacts and leave the competent authority ill-equipped to make a determination based on the information currently available.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks completeness and reliability, failing to offer an adequate understanding of the ecological receptors in the West Lewis coastal environment. This area is a biologically active marine system, yet the baseline data provided is insufficient. The methodologies employed do not

effectively capture the presence, behaviour, and habitat use of various species, compromising the assessment's ability to evaluate potential impacts reliably.

A significant shortcoming is the treatment of otters, classified as a European Protected Species. The application neglects to fully acknowledge and assess their active usage of coastal regions for foraging and movement. This oversight, particularly regarding their core foraging range and behavioural patterns, means that the possible effects of construction disturbances, such as noise and increased human activity, have not been adequately evaluated. Consequently, the conclusions drawn about the absence of significant effects on otters are undermined.

Moreover, the assessment of basking sharks is flawed, with reliance on aerial surveys leading to considerable detection bias, especially under Atlantic weather conditions. This method is likely to underestimate the presence of these sharks, particularly when compared to established land-based observations that suggest frequent usage of these waters. The failure to integrate or properly consider this data results in an incomplete baseline, further weakening the reliability of the conclusions drawn.

These methodological deficiencies mean that the claims of negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of sufficient baseline data also hampers the ability to assess cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty casts doubt on the true scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not align with the requirements of the Environmental Impact Assessment framework or National Planning Framework 4, as it has not adequately identified or assessed protected species. The level of uncertainty introduced prevents the exclusion of adverse effects with reasonable scientific certainty, thereby invoking the precautionary principle. Under these circumstances, granting consent is not legally permissible.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions makes the assessment unreliable. These deficiencies obstruct a thorough evaluation of the impacts on marine ecology and protected species, thereby revealing that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

A major contradiction arises within the application itself, as the developer claims no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which suggests that significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment, indicating that the conclusions drawn are unsupported by the evidence provided. The assessment lacks sufficient proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It inadequately considers the importance of these feeding grounds and relies on modelling approaches that introduce uncertainty, particularly for species in severe decline, like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially due to incomplete baseline data and an incomplete understanding of behavioural responses.

Moreover, the placement of turbines within a recognised migratory corridor presents a significant risk by creating a barrier in a primary flight path used by species travelling between the United Kingdom and Iceland. The application does not thoroughly 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 meet the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and limitations in the modelling, means that the standard of beyond reasonable scientific doubt has not been achieved. This necessitates the application of the precautionary principle and prevents a lawful conclusion in favour of consent.

The identified deficiencies also indicate non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not face adverse effects 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. These shortcomings hinder a robust evaluation of 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 of cultural heritage along the West Lewis coastline is fundamentally flawed, failing to recognise it as a living cultural landscape where the environment, language, tradition, and community are interwoven. The application adopts a narrow perspective that reduces heritage to isolated and static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment categorises them merely as static features.

This oversight disregards their continued use, meaning, and the impact that development could have on their setting. As a result, the evaluation of cultural effects is incomplete and ignores their vital role in community life.

Moreover, the assessment neglects intangible cultural heritage, including the Gaelic language, traditions, and the deep-rooted relationship between the community and the coastal environment. These elements are crucial to the area's identity, yet they are entirely overlooked, resulting in a significant gap in understanding the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, possessing a distinct cultural identity akin to that of an Indigenous People, has not been engaged through a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to adhere to established principles of participation in decisions that impact cultural and environmental interests.

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

These deficiencies place the proposal in direct conflict with the National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to address both tangible and intangible heritage, alongside the disregard for living cultural practices, marks a clear deviation from policy requirements.

Overall, the lack of assessment regarding living heritage, intangible cultural values, community rights, and adherence to statutory obligations creates a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application insufficient to assess the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which involved focus groups with local residents, has not been published in full, creating a significant evidential gap. This lack of transparency hinders both public understanding and the competent authority's ability to assess the social risks identified in the developer's own research. Summaries indicate that residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and should not be regarded as speculative; however, the failure to disclose the complete assessment restricts proper scrutiny and limits the evaluation of their significance in the decision-making process.

Furthermore, the proposal is viewed as a direct threat to community identity and

cohesion, with "cultural loss" noted in the developer's findings. Despite this acknowledgment, these impacts have not been adequately integrated into the main application or given due consideration. The withholding of the complete Social Impact Assessment obfuscates the true human and social costs associated with the development.

This lack of transparency also compromises the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. The absence of the full dataset means that the application does not provide a complete evidential basis necessary for evaluating the balance between benefits and 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 existing evidence points to adverse effects that remain undisclosed. Without the full assessment, it is impossible to verify compliance with this policy.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual and landscape impacts associated with the proposed development is fundamentally flawed and does not adequately convey the scale of change or the sensitivity of the environment. The coastline of West Lewis is characterised by its expansive Atlantic views, its undeveloped nature, and a profound sense of isolation. The planned installation of large turbines near the shoreline would impose an overwhelming industrial presence that would drastically alter this landscape, leading to a permanent and irreversible change in its character.

Moreover, the application fails to adequately represent the extent of visual change anticipated. The scale and proximity of the turbines are such that they would overshadow views from residential zones, historic sites, and popular coastal areas. This would significantly diminish visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment has not effectively communicated the severity of these impacts or their significance within this sensitive landscape context.

Methodological shortcomings further undermine the evaluation, especially regarding the selection and representation of visual viewpoints. It appears that some viewpoints do not sufficiently capture the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises concerns that the actual magnitude of visual impact has been understated, casting doubt on the assessment's overall reliability.

Additionally, there is a critical oversight in evaluating the interconnectedness of landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially tied to the Atlantic horizon. The assessment treats these assets in isolation without acknowledging their interdependence, leading to an incomplete understanding of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these connections, changing the context in which these heritage assets are appreciated and breaking their link to the natural horizon. This not only results in visual impacts but also inflicts broader cultural and spatial damage that the application has not adequately addressed.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4, particularly concerning the safeguarding of natural places and historic assets. The extent of change proposed is fundamentally incompatible with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case scenario assessment further weakens any argument of policy compliance.

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

In summary, the assessment inadequately reflects the scale of impact, the sensitivity of the environment, and the interrelatedness of landscape and heritage. These significant deficiencies hinder a reliable evaluation and reinforce the conclusion that this proposal is not compatible with the protection of the landscape.

CONSTRUCTION AND POLLUTION RISKS

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

of their adequacy or effectiveness.

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

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

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

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast support a diverse marine ecosystem alongside an active fishing industry. However, the assessment of fisheries and marine life related to the proposal is inadequate, failing to provide a solid evaluation of the ecological and socio-economic impacts. The application does not establish that these vital uses and habitats can be protected or maintained without significant disruption.

A critical concern is the assumption that fishing activities can be displaced without repercussions. The application lacks evidence to demonstrate that alternative fishing grounds are available, accessible, or able to sustain additional pressure. This significant oversight raises the risk of overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable risks to marine species, particularly through the underwater noise generated during construction. Extended high-energy

hammer piling is expected to cause disturbances across large distances, affecting species such as dolphins. The anticipated disruption to a substantial portion of the local bottlenose dolphin population is alarming, yet the application minimises the severity of these impacts, lacking adequate supporting evidence.

There is a notable inconsistency in the application regarding the need for licenses to permit harm to European Protected Species, which is acknowledged even while impacts are described as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially where harm is expected to require legal authorisation.

Additionally, the assessment does not adequately address cumulative impacts from multiple pressures such as habitat disturbance, noise, and the displacement of fishing activities. A thorough evaluation of these combined effects is essential to determine the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is critically deficient and does not encompass the complete range of impacts stemming from a singular integrated project. The onshore works, including cabling across protected moorland and the construction of a substation near Stornoway, are fundamentally linked to the offshore turbines. However, they are evaluated separately, which leads to a fragmented analysis that obscures the overall environmental and socio-economic consequences.

The onshore activities necessitate excavation in regions of deep peat, particularly within Barvas Moor, an area recognised as a significant carbon store and ecologically fragile habitat. The application lacks a thorough assessment of these impacts, inhibiting a full understanding of the project's comprehensive environmental footprint. By omitting or delaying the evaluation of onshore effects, the application restricts a proper appraisal of cumulative consequences. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively, yet the disjointed assessment of offshore and onshore components means that the combined repercussions on peatlands, habitats, and local communities remain inadequately addressed.

Furthermore, there are substantial risks to sensitive habitats, including machair systems and peatland environments, which are protected under policy. The application fails to demonstrate that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures are in place, highlighting a significant evidential gap in terms of biodiversity protection. Additionally, the disturbance of peatland raises concerns about carbon balance, as releasing stored carbon could result in a carbon debt that contradicts renewable energy development goals. This issue is not sufficiently addressed in the application, nor is there evidence to affirm that the overall carbon balance is favourable.

The routing of infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application does not provide proof that the necessary consents or procedures have been initiated, casting doubt on the project's deliverability and lawful execution. From a policy standpoint, the failure to evaluate the project in its entirety and to demonstrate the protection of peatlands, habitats, and land use interests contravenes both the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated significantly undermines the application.

In conclusion, the separation of project components, coupled with the absence of a comprehensive assessment and the lack of evidence regarding environmental and land use impacts, renders this segment of the application incomplete and untrustworthy, thus preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The application is fundamentally flawed due to the absence of assessments regarding dark skies and nocturnal wildlife, which represents a substantial omission in the Environmental Impact Assessment. The coastline of West Lewis is known for its remarkably dark skies, an essential aspect of the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, which would be visible over extensive distances, threatens to create a continuous and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment.

Moreover, there has been no consideration of how this lighting would affect visual amenity, landscape character, or the experiences of both residents and visitors. This lack of assessment is particularly concerning given the significance of dark skies to the region's identity and the growth of emerging tourism sectors like astro-tourism. The failure to evaluate these impacts results in a glaring gap in the overall landscape and environmental assessment.

Additionally, there is a complete lack of evaluation regarding the impacts of artificial lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to such lighting, which can lead to disorientation and an increased risk of collision. The application does not contain any lighting impact assessment or phototaxis study, meaning it fails to consider

how aviation lighting may influence these species or potentially raise mortality rates.

Compounding this issue is the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and the associated risks. For example, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data creates a crucial gap in understanding the ecological impacts of the proposal.

Without a thorough assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites would suffer adverse effects. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt is not met, thus invoking the precautionary principle and preventing a lawful determination.

From a policy standpoint, these omissions contradict National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. This oversight also diminishes the overall assessment of landscape and seascape impacts, as the night-time character is an integral element of the environment.

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

TOURISM

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

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

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

local economy.

In an island community with limited economic diversification, the lack of assessment regarding tourism impacts has broader implications for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that these economic vulnerabilities remain unexamined, in violation of the requirements set forth under the Islands (Scotland) Act 2018.

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm reflects a significant failure to meet the criteria of sustainable development in relation to statutory duties, national policy, and evidential standards. This application revisits the central issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. The current proposal, however, is submitted under a more rigorous policy framework that emphasises biodiversity, peatland protection, landscape integrity, and the wellbeing of communities.

Critical deficiencies exist in the evidential basis for the application, which fails to provide complete and reliable data. Significant gaps in baseline information, reliance on a vague design envelope, unspecified mitigation measures, and the exclusion of important impact pathways—such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—undermine the assessment. The Environmental Impact Assessment is therefore insufficient, rendering it impossible to fully understand the likely significant effects or residual impacts.

Moreover, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment contravenes the statutory obligations set forth in the Islands (Scotland) Act 2018, and the failure to present a complete Social Impact Assessment constitutes a significant oversight. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for assessment.

The proposal stands in direct opposition to the National Planning Framework 4. It fails to provide evidence of biodiversity protection, safeguarding of natural places, and preservation of cultural heritage. There is no demonstration that the health and

wellbeing impacts are acceptable, nor is there evidence of a net economic benefit due to the lack of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been adequately examined, obscuring their impact on peatlands, carbon balance, habitats, and crofting land.

There remains uncertainty and potential significance surrounding environmental risks. The evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain instances, inconsistent. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and hindering the ability to lawfully conclude that impacts are acceptable.

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

In summary, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, coupled with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority must either refuse consent based on these grounds or activate the relevant regulatory mechanisms to require the submission of the missing data.

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

Additional Comments

This would have devastating environmental and visual impact on our small island with zero local benefit that I can see.

Also, I strongly feel this would just be a foundation and further unwanted trashing of the ecosystem would follow.

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: 5E7A6D37

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted in accordance with the marine licensing and Environmental Impact Assessment regimes. A comprehensive review of the Environmental Impact Assessment Report and associated documentation reveals significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

Concerns arise primarily due to the unprecedented scale and design of the proposal, which raises questions about its compatibility with statutory requirements, national policy, and sustainable development principles. The application does not establish a sufficient evidential basis for a lawful determination. Critical environmental data is lacking, baseline information is inconsistent and limited, and several key aspects of the proposal remain undefined. The flexible design framework employed does not facilitate a clear assessment of likely significant effects, and the reliance on unspecified mitigation measures renders the evaluation of their effectiveness impossible. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to the absence of robust supporting evidence.

Moreover, there are evident and substantive conflicts with established policies. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural landscapes, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements for the protection of biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and impair the competent authority's ability to determine the proposal's acceptability in policy terms.

The proximity of large turbines to the shoreline introduces significant concerns regarding landscape capacity, visual dominance, and environmental impact. In light of the absence of adequate information, dependence on undefined mitigation strategies, evidential inadequacies, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. Thus, the application must invoke the precautionary principle.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant shortcomings and lacks a complete, transparent, and reliable evaluation of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations, creates considerable uncertainty and obstructs the consistent application of a worst-case scenario. This situation compromises the integrity of the assessment, making it impossible for both the public and the competent authority to grasp the true extent of environmental impacts that may arise from the development as ultimately constructed.

Additionally, the application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the premise that environmental damage will be managed later hinders any meaningful evaluation of the effectiveness of these measures and the assessment of residual impacts. This postponement of essential information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigation strategies be clearly established prior to decision-making.

Furthermore, there are notable evidential inadequacies, including lapses in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. These issues lead to uncertainty regarding the magnitude and significance of impacts, particularly where claims of negligible or non-significant effects are made without robust supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory obligations.

Consequently, the application does not fulfil the evidential requirements set forth under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and vulnerable habitats. Moreover, the proposal does not demonstrate adherence to National Planning Framework 4, specifically concerning biodiversity protection and environmental integrity, as it cannot verify that impacts have been thoroughly assessed or that appropriate safeguards have been established.

In summary, the combination of reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data collectively undermine the reliability and completeness of the Environmental Impact Assessment Report. These deficiencies obstruct a lawful and thorough assessment of environmental effects, rendering the competent authority incapable of making a well-informed determination based on the information supplied.

ASSESSMENT OF ALTERNATIVES

The application presented is fundamentally flawed in its assessment of alternatives, failing to meet the necessary standards outlined in the Environmental Impact Assessment regime. Instead of offering a detailed and structured evaluation of realistic alternatives based on their environmental consequences, the documentation merely

recounts the evolution of the project. This approach does not adequately establish that less harmful alternatives have been thoroughly identified, evaluated, and preferred over more damaging options.

There is a clear lack of transparency and evidence in the comparison of potential offshore sites, varying development scales, and design options. Notably, the application does not convincingly show that the developer has genuinely contemplated placing turbines further out to sea, which would likely lessen visual, ecological, and coastal impacts. Given the delicate nature of the West Lewis coastline, and the critical significance of distance from shore in assessing environmental impact, the omission of such analysis precludes any assertion that the proposed siting is the least damaging choice.

The shortcomings extend to the assessment of cable routing and landfall, where there is inadequate evidence indicating that alternative routes have been diligently investigated to circumvent or mitigate impacts on sensitive sites, including culturally and spiritually significant areas like Barvas Cemetery. The absence of a clear avoidance strategy, paired with a failure to conduct a comparative analysis, reveals that mitigation by design has not been implemented. Instead, there is an overreliance on measures intended to mitigate impacts after the design phase.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, infrastructure layout, and routing decisions. This represents a significant departure from the established mitigation hierarchy, hindering the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it cannot be determined that the proposal is sustainable or aligns with relevant policies.

From a policy standpoint, these deficiencies call into question compliance with National Planning Framework 4, particularly regarding the safeguarding of natural environments, cultural heritage, and community well-being. The failure to provide a structured and comparative assessment constitutes a material omission, further reinforcing the conclusion that the application has not been sufficiently evaluated and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The analysis of marine ecology and protected species is fundamentally inadequate, resulting in an unreliable assessment of ecological receptors within the West Lewis coastal environment. This area represents a sensitive and biologically rich marine ecosystem, yet the existing baseline data remains incomplete. The methodologies implemented fail to effectively document species presence, behaviour, and habitat use. Consequently, the assessment does not furnish a solid evidential basis necessary for evaluating potential impacts.

A notable deficiency is found in the treatment of otters, which are classified as a

European Protected Species. The application does not sufficiently acknowledge or assess the active usage of coastal zones by these animals for foraging and movement. The oversight concerning their core foraging range and behaviour significantly undermines the evaluation of potential construction-related disturbances, noise, and increased activity, leading to a failure to adequately consider the potential effects on this species.

The evaluation of basking sharks also presents significant shortcomings, particularly due to an overreliance on aerial surveys that introduce considerable detection bias, especially under Atlantic conditions. This methodology is likely to underestimate their presence, particularly when compared to established land-based observations that indicate frequent utilisation of these waters. The neglect to incorporate or adequately assess such data culminates in an incomplete baseline, thereby diminishing the trustworthiness of the conclusions drawn.

These methodological shortcomings result in findings of negligible or non-significant effects being based on unsubstantiated assumptions rather than robust evidence. The lack of comprehensive baseline data precludes a meaningful examination of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the actual scale of 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 National Planning Framework 4, as it fails to adequately identify and assess protected species. The uncertainty generated by these deficiencies obstructs the ability to dismiss adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, the law does not permit the granting of consent.

In conclusion, the amalgamation of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These weaknesses preclude a thorough evaluation of the impacts on marine ecology and protected species, leading to the overall assertion that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

Notably, a contradiction arises within the application itself, where the developer

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is severely lacking, failing to recognise the West Lewis coastline as a dynamic cultural landscape that integrates environment, language, tradition, and community. The application takes a narrow view, treating heritage merely as a collection of disconnected, static assets instead of acknowledging their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is the treatment of culturally important sites, such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practice; however, the assessment misclassifies them as static

features. This oversight neglects their ongoing significance and the implications of development on their surroundings, leading to an incomplete understanding of cultural effects and overlooking their importance in community life.

Additionally, the assessment fails to incorporate intangible cultural heritage elements, including the Gaelic language and traditions, as well as the enduring relationship between the community and the coastal environment. Such aspects are crucial to the area's identity but are completely omitted from the evaluation, which represents a major gap. Without including these factors, the cultural impacts of the development remain inadequately assessed.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity, identifiable as an Indigenous People, yet no Free, Prior and Informed Consent process has taken place. The lack of meaningful engagement compromises the credibility of the assessment and does not align with accepted principles for participation in decisions affecting cultural and environmental interests.

Moreover, there is a critical procedural flaw in the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment means the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community. This alone hampers a lawful determination.

From a policy standpoint, the deficiencies identified create a direct conflict with National Planning Framework 4, especially regarding the safeguarding of historic assets and locations. The neglect to assess both tangible and intangible heritage, alongside the failure to recognise living cultural practices, signifies a clear departure from policy stipulations.

Collectively, the oversight in evaluating living heritage, intangible cultural values, community rights, and legal obligations culminates in a notable evidential gap. The cultural impacts stemming from the development have not been thoroughly examined, and the application falls short of providing an adequate foundation for determining the true cultural costs of the proposal.

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 assessment of visual impacts, seascape, and landscape is significantly inadequate and does not accurately reflect the scale of change or the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. Introducing large-scale turbines near the shoreline would result in a continuous and imposing industrial presence, fundamentally changing this character and leading to a permanent and irreversible transformation of the landscape.

Furthermore, the application fails to adequately represent the extent of this visual change. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would have a direct effect on visual amenity, diminishing the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of this impact, especially within such a sensitive landscape.

There are also critical methodological issues regarding how visual viewpoints have

been selected and presented. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and landscapes of high value. This raises concerns that the visual impact may have been understated, which undermines the credibility of the assessment.

Additionally, there is a failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape interconnected by visual and spatial relationships to the Atlantic horizon. The assessment treats these as isolated entities rather than acknowledging their interdependence, leading to an incomplete analysis of the impacts on their setting and cultural significance.

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

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 inconsistent 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 weakens any assertion of policy compliance.

Lastly, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resulting change is, therefore, fundamental and permanent, rather than capable of being reduced 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 conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of pollution and construction risks related to the proposal is fundamentally lacking in detail, hindering any evaluation of potential environmental effects. Notably, the project entails extensive seabed preparation and installation works in a high-energy Atlantic environment. However, the absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans is alarming. The application relies on undefined mitigation and contingency measures that are intended to be formulated post-consent, which severely limits the opportunity for a meaningful assessment of their adequacy or potential effectiveness.

This reliance on unspecified future measures is especially troubling due to the sensitive nature of the receiving environment. The West Lewis coastline is characterised by clean coastal waters and critical habitats that are susceptible to disturbances from sediment and contamination. While the application acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide adequate detail on strategies to prevent, control, or monitor these risks.

Moreover, there remains significant uncertainty regarding the scale and behaviour of sediment plumes that may result from the proposed seabed disturbance and cable installation. In the absence of comprehensive modelling and clearly outlined management strategies, the extent, duration, and ecological consequences of these impacts cannot be accurately assessed. This uncertainty extends to the potential effects on marine species and habitats identified as sensitive within the broader assessment framework.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application fails to allow for an evaluation of whether effective safeguards are in place to address potential pollution events. This not only introduces procedural risks but also undermines the ability of the competent authority to thoroughly assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Assessments of likely significant effects and their corresponding mitigation measures must occur prior to granting consent. The absence of this critical information undermines the legality of the determination process. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposed application raises significant concerns regarding its assessment of fisheries and marine life. The waters off the West Lewis coast are home to a diverse marine ecosystem and a vibrant fishing industry, yet the evaluation does not adequately address how these essential habitats and activities will be protected or maintained.

A critical flaw in the assessment is the assumption that fishing can be relocated without negative effects. There is no evidence provided that alternative fishing grounds exist or are capable of sustaining the added pressure from displaced activities. This

lack of information is crucial, as such displacement could lead to overfishing in different areas and have broader economic repercussions for the local fishing fleet. Without a thorough and evidence-based evaluation, the impacts on both fisheries and local livelihoods remain unclear.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise generated by construction activities. The use of high-energy hammer piling for extended periods is likely to disturb marine life over considerable distances, notably affecting species like dolphins. The anticipated disturbance to a large portion of the local bottlenose dolphin population raises serious issues. However, the application appears to minimise these concerns without providing adequate supporting evidence.

There is also a notable inconsistency in the application regarding the necessity of licences for any harm to European Protected Species. While it acknowledges the need for legal authorisation where harm is anticipated, it simultaneously asserts that the impacts are negligible. This contradiction calls into question the reliability of the assessment and raises issues about compliance with the Habitats Regulations.

Furthermore, the evaluation does not adequately consider the cumulative impacts from various pressures, such as habitat disruption, noise, and the displacement of fishing activities. Without a comprehensive analysis of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not show that the proposed development can coexist with current marine users or avoid significant negative impacts on marine biodiversity, which obstructs any conclusion that it represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed assessment of the onshore infrastructure is fundamentally incomplete and neglects to address the full extent of impacts associated with this integrated project. The offshore turbines and onshore works are closely interconnected, yet they are evaluated separately, leading to a disjointed approach that conceals the overall environmental and socio-economic repercussions.

The onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and necessary access routes through sensitive landscapes. These activities involve excavation through deep peat areas, particularly in Barvas Moor, which is an important carbon store and ecologically

delicate habitat. The application falls short in delivering a thorough assessment of these impacts, thereby hindering a complete understanding of the project's environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all facets of a project be considered collectively; however, the division between offshore and onshore components prevents a comprehensive understanding of their combined impacts on peatlands, habitats, and communities.

Moreover, there are considerable risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application fails to prove that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This results in a significant evidential gap regarding biodiversity protection.

Concerns also arise relating to carbon balance. Disturbing peatland releases stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this matter or demonstrate that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is no evidence provided that the required consents or processes have been initiated, which casts doubt on the project's feasibility and legal compliance.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife is a significant oversight in the Environmental Impact Assessment. The West Lewis coastline boasts exceptionally dark skies, which play a vital role in the area's environmental quality, cultural identity, and tourism appeal. The proposal includes permanent red aviation lighting that would be visible over long distances, resulting in a continuous and disruptive "wall of light" effect that would drastically change the night-time environment.

This application fails to evaluate how such lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. This neglect is particularly troubling given the importance of dark skies to the local identity and the emerging tourism sector focused on astro-tourism. Consequently, there is a pronounced gap in the overall landscape and environmental assessment.

Moreover, there is no evaluation of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to their phototactic behaviour, which can cause disorientation and increase the risk of collisions. The application lacks any assessment of lighting impacts or a phototaxis study, failing to address how aviation lighting could affect these species or potentially raise mortality rates.

This issue is further compounded by the dependence on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and its associated risks. For instance, species like Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has not been assessed. The absence of site-specific night-time data leaves a crucial gap in understanding ecological impacts.

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

From a policy standpoint, this omission contravenes the National Planning Framework 4 regarding the safeguarding of natural areas and environmental quality. Furthermore, it diminishes the comprehensive evaluation of landscape and seascape impacts, as the character of night-time is an essential element of the environment.

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

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 application for the Spiorad na Mara Offshore Wind Farm fails to meet the necessary requirements for sustainable development. It does not align with statutory duties, national policy, or evidential standards. This proposal repeats the significant issues that led to the refusal of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the extent of industrialisation. Although the current application is presented under a stronger policy framework, it still does not adequately address biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are critical gaps in the evidential basis for determination. The application lacks complete baseline data, relies on an undefined design envelope, and specifies mitigation measures that have not been fully articulated. It omits essential impact pathways concerning nocturnal wildlife, onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete and does not

provide a comprehensive understanding of likely significant effects or residual impacts.

Additionally, procedural failures are evident. The absence of a compliant Island Communities Impact Assessment violates statutory obligations under the Islands (Scotland) Act 2018. Furthermore, not disclosing the complete Social Impact Assessment is a significant omission. These deficiencies hinder the competent authority from adequately evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

Environmental risks associated with the proposal remain unclear and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and internally inconsistent. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, engaging the precautionary principle and preventing a lawful conclusion that impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks precludes a lawful, 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

Our wild spaces deserve to stay wild and not be exploited to profit the few.
Mass industrialisation of our rural way of life will clear the highlands of people, wildlife and habitat.
I object strongly to this development.

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: 4C04F98B

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 application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from an examination of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, largely unspoiled environment, and rich cultural heritage. Concerns have been raised regarding the compatibility of the scale, proximity, and design of the proposal with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for lawful determination. There are critical gaps in environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many elements of the proposal remain undefined. The flexible design framework employed hinders a clear understanding of the potential significant effects, while the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are not substantiated by credible evidence.

There are also evident and substantial conflicts with policy. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It fails to establish that the national requirements for the protection of biodiversity, climate interests, and environmental integrity can be satisfied. Such conflicts directly challenge the statutory tests needed for consent and weaken the capacity of the competent authority to determine the proposal's acceptability in policy terms.

Moreover, the scale of the project is unprecedented for this area, with large turbines situated in close proximity to the shoreline. This raises significant issues regarding landscape capacity, visual impact, and overall environmental consequences. When considered together, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and pronounced policy non-compliance highlight that the application is incomplete and cannot support a lawful determination. Therefore, under these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate and fails to provide a comprehensive understanding of ecological receptors in the West Lewis coastal environment. This area is sensitive and biologically active, yet the baseline data is incomplete, and the methodologies used do not sufficiently capture the presence,

behaviour, and habitat use of species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

One major oversight concerns otters, which are a European Protected Species. The application does not appropriately recognise or assess their active use of coastal regions for foraging and movement. The failure to consider their core foraging range and behavioural patterns means the possible impacts of construction disturbance, noise, and increased activity have not been adequately evaluated. This significantly weakens any conclusions drawn about the absence of significant effects on this species.

There are also serious shortcomings in the assessment of basking sharks. Relying on aerial surveys introduces a significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The neglect to incorporate or properly consider such relevant data leads to an incomplete baseline and undermines the reliability of the conclusions presented.

These methodological flaws mean that the conclusions of negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of sufficient baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This results in uncertainty regarding the true extent of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set out in the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or assessed. The uncertainty introduced precludes the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, consent cannot be granted lawfully.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposal is fundamentally flawed, revealing significant gaps in evidence and inconsistencies that undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to sufficiently demonstrate that these species will not face adverse effects. The development is situated within key foraging areas and migratory pathways, yet the assessment does not adequately evaluate the risks of displacement, collision, or habitat loss.

A notable contradiction arises within the application, where the developer asserts that

there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence.

Furthermore, the assessment does not convincingly establish 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 comprehensively addressed, and the reliance on modelling introduces uncertainties, particularly concerning species that are in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially in areas where baseline data is insufficient and behavioural responses remain poorly understood.

The positioning of turbines within a designated migratory corridor presents an additional and considerable risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to thoroughly assess the long-term implications 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 gaps and limitations in modelling, indicates that the standard of proof beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle, hindering any lawful conclusion in support of consent.

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

Collectively, these issues render the assessment unreliable due to internal inconsistencies, methodological weaknesses, and insufficient evidence. Such shortcomings obstruct a thorough evaluation of impacts and lead to the conclusion that the application does not meet the statutory requirements essential for determination.

FISHERIES AND MARINE LIFE

The application presents significant deficiencies in its 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 varied marine ecosystem and a vibrant fishing industry. However, the proposal does not demonstrate how these habitats and activities can be safeguarded from substantial disruption.

One major concern lies in the presumption that fishing activities can be relocated without negative effects. There is no evidence supplied that alternative fishing grounds

are accessible or capable of supporting additional fishing pressure. This lack of information is critical, as displacement could lead to overfishing in other areas, potentially resulting in broader economic repercussions for the local fishing fleet. Consequently, the implications for fisheries and livelihoods remain poorly understood due to the absence of a clear, evidence-based assessment.

The application raises serious concerns regarding risks to marine species, particularly due to the underwater noise expected from construction activities. The anticipated high-energy hammer piling over a prolonged period may disturb marine life across extensive distances, with species such as dolphins being notably affected. The potential disturbance to a significant portion of the local bottlenose dolphin population is concerning; however, the application appears to downplay these impacts, lacking adequate supporting evidence.

Moreover, the application inconsistently acknowledges the need for licenses to authorise harm to European Protected Species, while simultaneously describing such impacts as negligible. This contradiction diminishes the credibility of the assessment and prompts worries about compliance with the Habitats Regulations, especially in cases where anticipated harm necessitates legal authorisation.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal entails the introduction of permanent red aviation lighting, which is expected to create a continuous and intrusive “wall of light” effect across the western horizon. This would fundamentally alter the night-time environment. Notably, the Environmental Impact Assessment is devoid of any consideration regarding dark skies and nocturnal wildlife, representing a significant omission. The West Lewis coastline is distinguished by exceptionally dark skies, which are integral to environmental quality, cultural identity, and tourism value.

The lack of an assessment pertaining to the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors is particularly concerning, especially considering the significance of dark skies to the region's identity and emerging sectors like astro-tourism. This failure to evaluate potential impacts creates a clear deficiency in the overall landscape and environmental assessment.

Moreover, there is no analysis of how nocturnal wildlife might be affected. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel display sensitivity to artificial lighting, which can lead to disorientation and increased collision risk. The absence of a lighting impact assessment or phototaxis study within the application results in a failure to understand how aviation lighting may influence these species or contribute to mortality rates.

Compounding this issue is the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation caused by artificial lighting, yet this risk remains unassessed. The failure to include site-specific night-time data presents a critical gap in understanding ecological impacts.

In the absence of nocturnal impact assessments, it remains impossible to ascertain whether protected species or designated sites would experience adverse effects. The evidential standard required to demonstrate that adverse effects do not exist beyond reasonable scientific doubt cannot be achieved, necessitating adherence to the precautionary principle and thus inhibiting lawful determination.

From a policy standpoint, these omissions are inconsistent with National Planning Framework 4 regarding the protection of natural environments and overall environmental quality. This oversight undermines the comprehensive assessment of landscape and seascape impacts, as the character of the night-time environment is a fundamental aspect of the ecosystem.

In conclusion, the lack of any evaluation of dark skies and nocturnal wildlife creates a substantial evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis result in an incomplete application that cannot adequately support a lawful determination.

TOURISM

The assessment regarding the impacts of tourism is severely lacking and does not adequately address the economic and social consequences for a vital sector of the Isle of Lewis economy. The area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are essential to tourism, which is fundamentally reliant on these attributes. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution.

Tourism on the Isle of Lewis has experienced substantial growth, rising from £65 million in 2017 to more than £81.5 million, supporting over 1,000 jobs and representing up to 16% of the island's economy. However, the application does not analyse how the industrialisation of the seascape and the decline in environmental quality could affect Tourism Gross Value Added or the broader economic resilience. Without this crucial analysis, it remains uncertain whether the proposed development would bring a net economic benefit or jeopardise an established and thriving sector.

Moreover, the evaluation neglects to acknowledge the significance of environmental quality for tourism, particularly the value of unspoiled landscapes and dark skies in shaping visitor experiences and supporting emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this oversight, resulting in a considerable gap in understanding the impacts on a recognised and expanding segment of the local economy.

In a context where the island community has limited economic diversification, the failure to evaluate tourism impacts carries broader ramifications for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been appropriately assessed as mandated by 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 of proving net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide enough evidence for the competent authority to accurately evaluate the economic consequences of the proposal.

Ultimately, the inability to quantify tourism impacts, assess the environmental factors that drive visitor behaviour, and consider the island's economic dependence leads to a significant evidential gap. This inhibits a thorough evaluation of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm signifies a profound failure to meet the criteria for sustainable development in light of statutory obligations, national policy, and evidential standards. It revisits the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. This current proposal is now submitted under a more robust policy framework that places heightened emphasis on biodiversity, peatland conservation, landscape integrity, and community wellbeing.

The submission lacks a comprehensive and reliable evidential foundation necessary for a proper determination. Notable gaps exist in baseline data, the continued reliance on an unspecified design envelope, unclarified mitigation measures, and a failure to address significant impact pathways, including nocturnal wildlife, complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact

Assessment is incomplete, failing to provide a clear understanding of the likely significant effects or any residual impacts.

Procedurally, there are evident failures present. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to present the complete Social Impact Assessment represents a critical omission. Such deficiencies hinder the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

In direct contradiction to National Planning Framework 4, the proposal does not illustrate adequate protection of biodiversity, natural areas, and cultural heritage. It fails to prove that health and wellbeing impacts are acceptable and does not demonstrate a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been thoroughly evaluated, thus obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

There remains a degree of uncertainty regarding environmental risks that could be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in places. The evidential standard required to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, thus engaging the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

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

Taken collectively, the application is both procedurally and substantively inadequate for determination. The extent of informational deficiencies, along with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority is compelled to either refuse consent based on these grounds or invoke appropriate regulatory measures to mandate the submission of the required information.

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

Additional Comments

I am not at all convinced that the impacts of this offshore wind farm have been assessed properly. The latest research that I read noted the adverse effect on large sea mammals, and this is of major concern given the number of strandings that we are seeing in Scotland.

The turbines will have an adverse impact on local fishing, and on visiting sailing boats.

The area is noted for its dark skies and for seeing Na Fir-Chlis (the Northern Lights) which provide feel-better factors for visitors and local residents alike.

Thus overall the scheme will be detrimental to the Isle of Lewis financially and ecologically.

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: C3FD52E1

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 is incomplete and fails to deliver a full, transparent, or dependable account of the potential environmental effects of the

proposal. The flexible Project Design Envelope used lacks commitment to specific turbine dimensions, layouts, or configurations, introducing significant uncertainty. This flexibility obstructs a consistent application of a worst-case scenario, undermining the integrity of the assessment. As a result, the impacts presented may not accurately represent the development that will ultimately be constructed, leaving both the public and the competent authority unaware of the true extent of environmental effects.

Consent is sought based on mitigation measures, monitoring strategies, and management plans that have not yet been defined. This approach prevents any meaningful evaluation of effectiveness or assessment of residual impacts, as it relies on the notion that environmental harm will be addressed at a later stage. Such deferral of critical information to post-consent phases is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be established clearly before determination.

The report also shows significant evidential deficiencies, with gaps in baseline data, limitations in methodology, and an over-reliance on assumptions rather than site-specific evidence. This lack of robust supporting data leads to uncertainty regarding the scale and significance of impacts, especially where conclusions regarding negligible or non-significant effects are drawn. The insufficient information hinders a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal fails to demonstrate compliance with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it is unclear whether impacts have been fully assessed or if 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 all contribute to rendering the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings hinder a lawful and robust assessment of environmental effects, leaving the competent authority unable to determine the application based on the provided information.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate, failing to provide a thorough or dependable understanding of ecological receptors in the West Lewis coastal environment. This marine system is highly sensitive and biologically active, yet the baseline data is incomplete. The methodologies employed do not sufficiently capture species presence, behaviour, and habitat use, resulting in a lack of a solid evidential foundation for evaluating impacts.

A significant shortfall in the assessment concerns otters, which are a European Protected Species. The application does not adequately acknowledge or assess their active use of coastal areas for foraging and movement. Consequently, the lack of evaluation regarding their core foraging range and behavioural patterns means that the potential effects of construction disturbance, noise, and increased activity have not been thoroughly assessed. This gap undermines any conclusions drawn about the absence of significant effects on this species.

Moreover, the assessment of basking sharks is flawed due to the reliance on aerial surveys, which introduce considerable detection bias, especially in Atlantic conditions. This methodology is likely to underestimate their presence when compared to established land-based observations that indicate frequent usage of these waters. The failure to properly incorporate or consider such data results in an incomplete baseline, diminishing the reliability of the conclusions reached.

These methodological flaws lead to assertions of negligible or non-significant effects based on assumptions rather than solid evidence. The lack of sufficient baseline data also hampers meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty clouds 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 fails to properly identify or assess protected species. The level of uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application is fundamentally flawed, particularly in its ornithological assessment, which contains significant gaps and internal inconsistencies that undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application does not sufficiently demonstrate that these species will not be adversely affected. The proposed development is situated within key foraging areas and migratory pathways, yet the assessment fails to adequately evaluate the implications of displacement, collision risk, or habitat loss.

There is a notable contradiction within the application itself, as the developer concludes that there will be no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is only necessary when

significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions are not backed by the available evidence. The assessment lacks adequate evidence to ensure 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 considered, and the reliance on modelling introduces uncertainty, particularly for declining species like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially given that baseline data is incomplete and behavioural responses are not fully understood.

Placing turbines within a recognised migratory corridor poses an additional and substantial risk, effectively acting as a barrier in a key flight path for species travelling between the United Kingdom and Iceland. The application does not provide a thorough assessment of the long-term consequences of sustained mortality in this corridor, nor does it evaluate the potential effects on species with small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to confirm no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and prevents a lawful conclusion in support of consent. Furthermore, the identified deficiencies represent a failure to adhere to National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected puts the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is fundamentally a living cultural landscape, where the environment, language, tradition, and community are closely intertwined. However, the assessment of cultural heritage and community identity in the application is fundamentally inadequate, as it treats heritage as isolated, static assets rather than recognising their ongoing social, cultural, and spiritual functions within the community.

A significant shortcoming of the assessment is its handling of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations for burial and spiritual practices, yet the assessment categorises them as static features, neglecting their continued use, significance, and the potential impact of development on their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural effects and ignores their vital role in community life.

Moreover, the application fails to address intangible cultural heritage, including the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These elements are vital to the area's identity, yet they are entirely omitted from the assessment, which constitutes a significant oversight. Without acknowledging these factors, it becomes impossible to fully understand the cultural impact of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which has a distinct cultural identity that aligns with recognised characteristics of Indigenous Peoples, has not been engaged in a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and disregards established principles of participation in decisions affecting cultural and environmental interests.

A further 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 means the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic effects on the island community. This oversight alone renders a lawful determination impossible.

From a policy standpoint, these deficiencies place the proposal at odds with National Planning Framework 4, especially concerning the protection of historic assets and places. The disregard for both tangible and intangible heritage, along with the failure to recognise living cultural practices, marks a clear deviation from policy requirements.

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory obligations creates a considerable 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 costs of the proposal.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies in its assessment of construction and pollution risks, lacking the necessary detail to thoroughly evaluate the likely environmental effects. It entails extensive seabed preparation and installation work in a high-energy Atlantic environment, yet fails to include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application leans on mitigation and contingency measures that would be formulated after consent, thereby obstructing any meaningful assessment of their potential adequacy or effectiveness.

This approach raises serious concerns given 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. While the application does acknowledge risks such as sediment mobilisation and accidental chemical or oil spills, it falls short in outlining how these risks will be prevented,

controlled, or monitored effectively.

Moreover, uncertainties regarding the scale and behaviour of sediment plumes created by seabed disturbance and cable installation further complicate matters. In the absence of rigorous modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these activities. This uncertainty also extends to potential effects on marine species and habitats that are already recognised as sensitive in the broader context.

Additionally, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application hinders the evaluation of whether adequate safeguards are established to address pollution events. This procedural risk undermines the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements set out by the Environmental Impact Assessment regime. Significant effects and the necessary mitigation measures must be evaluated prior to consent, and without this information, a lawful determination is not feasible. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, insufficient management plans, and prevailing uncertainties regarding potential impacts culminate in a materially deficient assessment. These shortcomings prevent a thorough evaluation of construction and pollution risks and strongly support the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application under review lacks a thorough assessment of fisheries and marine life, failing to provide a robust evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the proposal does not sufficiently demonstrate how these important uses and habitats can be protected or maintained without substantial disruption.

A significant concern within the application is the assumption that fishing activities can be displaced without any consequences. There is no evidence presented to indicate that alternative fishing grounds are available, accessible, or capable of sustaining any increased pressure from displaced activities. This critical omission poses a risk of overfishing in other areas, which could have broader economic implications for the local fishing fleet. Without a clear and evidence-based evaluation, the potential impacts on fisheries and local livelihoods remain poorly understood.

Moreover, the proposal presents considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The use of high-

energy hammer piling for extended periods is likely to cause disturbances over large distances, negatively affecting species such as dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population raises serious concerns; yet, the application appears to downplay these potential effects without sufficient supporting evidence.

There exists a notable inconsistency in the application regarding the necessity for licenses to permit harm to European Protected Species, while simultaneously describing the impacts as negligible. This contradiction undermines the credibility of the assessment and raises issues concerning compliance with the Habitats Regulations, particularly when harm is anticipated to a degree that warrants legal authorisation.

Additionally, the assessment fails to take into account the cumulative impacts that arise from multiple pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. Absent a comprehensive evaluation of these combined effects, it is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory obligations, national policies, and evidential standards. This application mirrors the central issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. Now, this new application is presented under a framework that more strongly emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Significant gaps exist in the evidential basis for determining this application. There are deficiencies in baseline data, an undefined design envelope is employed, and unspecified mitigation measures are relied upon. Key impact pathways concerning nocturnal wildlife, complete onshore infrastructure, and tourism effects have not been addressed. Consequently, the Environmental Impact Assessment is inadequate and

fails to provide a clear understanding of the likely significant effects or residual impacts.

Moreover, there are notable procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands (Scotland) Act 2018. Additionally, the failure to disclose a comprehensive Social Impact Assessment represents a material omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

This proposal stands in direct contradiction to National Planning Framework 4. It does not demonstrate protection for biodiversity, natural areas, and cultural heritage. Furthermore, it fails to show that impacts on health and wellbeing are acceptable and cannot provide evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impact of both offshore and onshore elements has not been thoroughly assessed, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

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

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

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

Thus, I formally request that the application for the Spiorad na Mara Offshore Wind Farm is rejected in its entirety.

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: EA2DD7C2

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough examination of the Environmental Impact Assessment Report and its supporting documents has revealed significant deficiencies in planning, environmental considerations, cultural impacts, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its stunning Atlantic-facing coastline, near-pristine surroundings, and rich cultural heritage. The design, scale, and proximity of the wind farm raise profound questions about its alignment with statutory obligations, national policy, and the principles governing sustainable development.

Fundamentally, the application lacks a sufficient evidential foundation for a lawful decision. Key environmental data is notably absent, and the baseline information provided is limited and inconsistent. Moreover, crucial elements of the proposal remain undefined. The flexible design framework employed hinders a clear assessment of potential significant effects, and the reliance on unspecified mitigation measures prevents a proper evaluation of their effectiveness. Consequently, the documentation fails to offer a comprehensive understanding of the environmental, cultural, or community implications, leaving claims of negligible or non-significant effects unsupported by solid evidence.

There are evident and serious conflicts with established policies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment requirements, or National Planning Framework 4, especially concerning biodiversity, natural habitats, cultural heritage, and public health and wellbeing. It does not prove that it can meet national obligations to safeguard biodiversity, address climate issues, and maintain environmental integrity. These discrepancies directly challenge the statutory requirements for consent and weaken the authority's capacity to deem the development acceptable from a policy perspective.

The unprecedented scale of this proposal raises additional concerns, particularly with the large turbines being sited in close proximity to the shoreline. This introduces significant worries about landscape capacity, visual impact, and broader environmental ramifications. Collectively, the insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy violations illustrate that the application is incomplete and unable to support a lawful decision. In light of these circumstances, it is imperative that the precautionary principle is invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application does not adequately assess alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of providing a

structured and reasoned comparison of realistic alternatives based on their environmental effects, it offers a narrative of project evolution. This method does not show that less harmful options have been properly identified, assessed, and preferred over more damaging solutions.

There is a lack of transparent and evidence-based comparison for alternative offshore locations, development scales, or design configurations. The developer has not convincingly considered placing turbines further offshore, which could reduce visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the critical importance of proximity to shore mean that this lack of analysis prevents any conclusion that the proposed siting is the least damaging option.

Insufficient evidence is also present regarding cable routing and landfall assessment. The application does not show that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually important areas like Barvas Cemetery. The absence of a clear avoidance strategy and a lack of comparative analysis suggest that mitigation by design has not been utilised, 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 and hampers the competent authority's ability to understand if less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal is sustainable or complies with policy.

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, particularly in relation to the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that leads to the overall conclusion that the application has not been sufficiently assessed and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species presented in the application is fundamentally flawed and cannot be relied upon to provide an accurate understanding of the ecological receptors in the West Lewis coastal area. This marine environment is both highly sensitive and biologically vibrant, yet the baseline data is insufficient and the methodologies used do not effectively capture essential aspects of species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a robust evidential basis for determining the potential impacts.

Significantly, the assessment fails to appropriately recognise the presence of otters, a species protected under European law, in relation to their foraging and movement along coastal regions. The oversight in accounting for their core foraging range and behavioural patterns means that the potential impacts from construction disturbances,

noise, and increased activity have not been thoroughly evaluated. This oversight undermines any claims regarding the absence of significant impacts on otters.

In addition, the assessment of basking sharks reveals further shortcomings, particularly due to the reliance on aerial surveys which are subject to substantial detection bias, especially under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, particularly when compared to established land-based observations that indicate regular usage of these waters. The exclusion or inadequate consideration of such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological deficiencies lead to conclusions regarding negligible or non-significant effects being rooted in assumptions rather than solid evidence. Furthermore, the lack of adequate baseline data obstructs a meaningful examination of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This generates uncertainty surrounding the real level of risk 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 National Planning Framework 4, as it has failed to accurately identify and assess protected species. The uncertainty introduced by these deficiencies means that adverse effects cannot be excluded beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is not lawful to grant consent.

Overall, the combination of insufficient baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These shortcomings obstruct a thorough evaluation of the impacts on marine ecology and protected species and reinforce the conclusion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that undermine its findings. The application is situated in key foraging areas and migratory pathways along the west coast of the Isle of Lewis, an area that supports internationally important seabird populations, many of which are already in decline. However, the application fails to adequately demonstrate that these species will not be adversely affected.

There exists a critical contradiction within the application; the developer asserts that no significant adverse effects are anticipated while simultaneously advancing a case for Habitats Regulations derogation, a process triggered only when significant harm is expected. This inconsistency raises serious questions about the reliability of the assessment and suggests that the conclusions drawn are not underpinned by sufficient evidence.

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 importance of these feeding grounds is not thoroughly acknowledged, and the reliance on modelling approaches introduces uncertainty, particularly concerning species that are in severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly given the incomplete baseline data and the unclear understanding of behavioural responses.

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

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, means the standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle and prevents a lawful conclusion that would support consent.

The deficiencies identified in the assessment also indicate a failure to comply with National Planning Framework 4, particularly concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected directly conflicts with national policy.

In summary, these various shortcomings render the assessment unreliable due to internal inconsistencies, methodological weaknesses, and insufficient evidence. Collectively, they hinder a robust evaluation of the impacts and contribute to the conclusion that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application presents a significant lack of thoroughness in its assessment of cultural heritage and community identity, treating the West Lewis coastline merely as a collection of static assets rather than a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. By adopting a reductive approach, it overlooks the ongoing social, cultural, and spiritual functions these heritage sites serve within the community.

A notable shortcoming is evident in the handling of culturally significant locations, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are actively used for burial and spiritual practices, yet they are inaccurately classified as static features. This failure to consider their continued use and meaning leads to an incomplete understanding of the cultural implications and neglects their vital role in community life.

Moreover, the assessment disregards intangible cultural heritage, which includes the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are central to the area's identity yet are entirely absent from the evaluation, marking a significant oversight. Without accounting for these factors, it becomes impossible to grasp the true cultural impact of the proposed development.

Concerns extend to community rights and engagement, especially considering that the Gaelic-speaking population embodies characteristics of an Indigenous People. The absence of a process for Free, Prior and Informed Consent raises questions about the legitimacy of the assessment and fails to align with recognised principles of participatory decision-making that affect cultural and environmental interests.

Additionally, there is a critical procedural failure due to the lack of a compliant Island Communities Impact Assessment, a statutory requirement established under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community. This omission alone renders the determination of the proposal unlawful.

From a policy perspective, the identified deficiencies place the application in direct contradiction with National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, constitutes a clear deviation from policy standards.

Collectively, the failure to address living heritage, intangible cultural value, community rights, and statutory requirements culminates in a considerable evidential gap. The cultural consequences of the development have not been adequately assessed, and the application lacks a sufficient basis for a proper evaluation of the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to disclose the full Social Impact Assessment is a significant concern that undermines the Environmental Impact Assessment process. Without this transparency, the competent authority cannot conduct a robust evaluation of the social, economic, and health implications of the proposed development. The absence of complete data constitutes a material omission and fails to meet the evidential requirements necessary for lawful decision-making.

Local residents have expressed measurable stress, anxiety, and concern due to the scale and proximity of the proposal, which reflects a tangible impact rooted in direct engagement. This evidence, derived from community feedback, highlights the risks associated with the development but remains inadequately addressed in the application due to the non-disclosure of the full assessment.

Moreover, the developer's findings indicate a perception of the proposal as a threat to community identity and cohesion, with significant concerns about "cultural loss." However, these issues have not been fully integrated into the application or given proper consideration. As a result, the true human and social cost of the development remains obscured, limiting the ability to assess the overall significance of these impacts.

From a policy perspective, there is a failure to comply with National Planning Framework 4, which emphasizes the need for developments to support positive health outcomes and avoid harm. The existing adverse effects highlighted in the available evidence have not been sufficiently disclosed, making it impossible to demonstrate adherence to this policy.

Collectively, these issues reveal a concerning gap in the assessment process. The non-disclosure of the full Social Impact Assessment, coupled with the evidence of existing negative impacts, results in an incomplete and unreliable evaluation. This hinders the ability to make a lawful determination regarding the application and highlights the necessity for a comprehensive understanding of the social impacts involved.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal seeks to introduce large-scale turbines along the West Lewis coastline, an area characterised by its open Atlantic horizon, undeveloped nature, and pronounced sense of remoteness. This installation would establish a continuous industrial presence near the shoreline, leading to a fundamental and irreversible transformation of the landscape. The assessment of the seascape, landscape, and visual impacts associated with this proposal is materially deficient, failing to accurately represent the scale of change or the sensitivity of the receiving environment.

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

Furthermore, the assessment neglects to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are situated within a broader landscape that is visually and spatially linked to the Atlantic horizon. Treating these assets as isolated entities undermines a comprehensive evaluation of their settings and cultural significance. The proposed industrialisation of the seascape would disrupt these

relationships, changing the context in which heritage assets are experienced and severing their ties to the natural horizon. This presents not just a visual concern but also a broader cultural and spatial harm that the application has not adequately addressed.

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is insufficient and lacks the detail needed to evaluate environmental effects. The proposal includes significant seabed preparation and installation works in a high-energy Atlantic environment, but there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures to be prepared after consent, which hinders any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises concerns given the sensitivity of the surrounding environment. The West Lewis coastline features clean coastal waters and important habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not provide enough detail on 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 thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also applies to potential effects on marine species and habitats already recognised as sensitive within the wider assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent, the application fails to allow for an evaluation of whether appropriate safeguards are in place to address pollution

incidents. This situation introduces procedural risk and weakens the ability of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of crucial environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed before consent can be granted, and without such information, a lawful determination is not possible. Additionally, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

In summary, the lack of defined mitigation measures, absence of detailed management plans, and uncertainty about potential impacts make 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 application under review lacks a thorough assessment of fisheries and marine life, failing to provide a robust evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the proposal does not sufficiently demonstrate how these important uses and habitats can be protected or maintained without substantial disruption.

A significant concern within the application is the assumption that fishing activities can be displaced without any consequences. There is no evidence presented to indicate that alternative fishing grounds are available, accessible, or capable of sustaining any increased pressure from displaced activities. This critical omission poses a risk of overfishing in other areas, which could have broader economic implications for the local fishing fleet. Without a clear and evidence-based evaluation, the potential impacts on fisheries and local livelihoods remain poorly understood.

Moreover, the proposal presents considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The use of high-energy hammer piling for extended periods is likely to cause disturbances over large distances, negatively affecting species such as dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population raises serious concerns; yet, the application appears to downplay these potential effects without sufficient supporting evidence.

There exists a notable inconsistency in the application regarding the necessity for licenses to permit harm to European Protected Species, while simultaneously describing the impacts as negligible. This contradiction undermines the credibility of the assessment and raises issues concerning compliance with the Habitats Regulations, particularly when harm is anticipated to a degree that warrants legal authorisation.

Additionally, the assessment fails to take into account the cumulative impacts that arise from multiple pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. Absent a comprehensive evaluation of these combined effects, it is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The environmental assessment of the onshore infrastructure associated with this project is fundamentally lacking and fails to account for the comprehensive impacts of what constitutes a single integrated initiative. The offshore turbines and the related onshore works are interconnected; however, they are evaluated independently, leading to a disjointed approach that obscures the full extent of environmental and socio-economic repercussions.

The onshore aspects of the proposal involve cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities include excavation across regions of deep peat, particularly in Barvas Moor, which is an important carbon store and an ecologically delicate habitat. The application lacks a thorough examination of these impacts, hindering a complete understanding of the project's overall environmental implications.

By neglecting to assess the onshore impacts or deferring such evaluations, the application inhibits a proper analysis of cumulative effects. The Environmental Impact Assessment process mandates that all facets of a project are considered collectively; yet, the division between offshore and onshore components means that the cumulative impacts on peatlands, habitats, and local communities are inadequately understood.

There are also substantial threats to sensitive habitats, such as machair systems and peatland environments, which benefit from policy protection. The application fails to demonstrate that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This results in a significant

evidential void concerning biodiversity conservation.

Additionally, the routing of infrastructure through active croft land raises concerns about potential conflicts with current land use and legal rights. The application does not present evidence that the required consents or processes have been set in motion, raising doubts about 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 contravenes the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application.

In summary, the disaggregation of project components, the lack of a thorough assessment, and the absence of evidence regarding environmental and land use impacts render this segment of the application incomplete and untrustworthy, ultimately obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife represents a significant omission within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to environmental quality, cultural identity, and tourism. The proposed introduction of permanent red aviation lighting, visible from long distances, would create an intrusive “wall of light” across the western horizon, fundamentally changing the night-time environment.

Moreover, 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 oversight is particularly notable given the importance of dark skies to the area’s identity and its emerging tourism sectors, including astro-tourism. The resulting failure to consider these impacts signifies a substantial gap in the overall landscape and environmental assessment.

Critically, there is no evaluation of the impacts on nocturnal wildlife. Certain species, such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, are highly sensitive to artificial lighting, as phototaxis can result in disorientation and increased risk of collision. The application fails to incorporate any lighting impact assessment or phototaxis study, thus neglecting to address how aviation lighting might affect these species or contribute to mortality.

This omission is exacerbated by the dependence on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or the associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this potential impact has not been assessed. The lack of site-specific night-time data creates a critical gap in understanding ecological impacts.

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

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

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

TOURISM

The assessment of tourism impacts is critically inadequate, failing to analyse 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 landscapes, dark skies, and a sense of remoteness. While the application recognises that 86% of visitors are attracted by the scenery, it neglects to provide any quantitative analysis regarding how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution from tourism.

The economic significance of tourism has been notable, with growth from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application does not address how the industrialisation of the seascape and deterioration of environmental quality might affect the Tourism Gross Value Added or the broader economic resilience. In the absence of this analysis, it remains unclear whether the proposed development would yield a net economic benefit or harm an established and expanding sector.

The omission of a Dark Skies Assessment further exacerbates the issue, as it overlooks the critical role of environmental quality in fostering tourism. Unspoiled landscapes and dark skies are integral to visitor experiences and the burgeoning markets of nature-based tourism and astro-tourism. This lack of consideration highlights a substantial gap in understanding the impacts on a recognised and expanding segment of the local economy.

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

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly concerning economic impact and the necessity to show net benefit. It contradicts strategic objectives that highlight tourism as a priority growth sector and lacks sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

Overall, the inability to quantify tourism impacts, assess environmental influences on visitor behaviour, and acknowledge the economic dependency of the island culminates in a significant evidential void. This hinders a thorough evaluation of economic effects and supports the assertion that the application remains incomplete.

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

We as a family lived on Lewis until 2024, when this windfarm was in the initial proposals, and although it wasn't the main factor in us moving away, it certainly was a big factor. The impact that this development will have on the marine ecology, tranquility and outstanding beauty of the islands is tremendously negative. The developers have vastly overstated any community benefits, and Under-represented the enormous visual impact that this will have for residents and tourists. The Outer Hebrides are a pristine environment, and this fragile ecology should be protected, not built upon.

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: 43CFC572

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

Dear Sir/Madam

This letter represents a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment requirements. The objection arises from a comprehensive review of the Environmental Impact Assessment Report and its accompanying documents, revealing significant 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 renowned for its Atlantic-facing coastline, nearly pristine environment, and rich cultural heritage. The dimensions, closeness to the coast, and design of the wind farm present serious questions about its alignment with statutory obligations, national policies, and the tenets of sustainable development.

A primary concern is the lack of adequate evidence supporting a lawful decision. Important environmental data is absent, baseline information is both limited and inconsistent, and critical components of the proposal are not clearly defined. The flexible design framework employed hinders a comprehensive understanding of the likely significant impacts, and the reliance on unspecified mitigation measures precludes a proper evaluation of their effectiveness. Consequently, the documentation fails to provide a complete or informed overview of potential environmental, cultural, or community consequences, making assertions of negligible or non-significant effects unsubstantiated by strong evidence.

Additionally, there are substantial conflicts with existing policies. The proposal appears to contravene the National Marine Plan, the Environmental Impact Assessment framework, and the National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not adequately demonstrate compliance with national obligations to preserve biodiversity, safeguard climate interests, or maintain environmental integrity. These discrepancies are critical as they directly impact the statutory tests necessary for granting consent and compromise the ability of the relevant authority to determine the development's acceptability from a policy standpoint.

The unprecedented scale of the proposed wind farm, with large turbines set in close proximity to the shoreline, raises significant concerns about landscape capacity, visual impact, and environmental consequences. Collectively, the lack of sufficient information, the dependence on undefined mitigation strategies, evidential shortcomings, and clear policy violations highlight that the application is incomplete and cannot support a lawful determination. In light of these factors, it is essential to apply the precautionary principle.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency, failing to deliver a dependable account of the anticipated environmental consequences of the proposal. One significant concern is the flexible Project Design Envelope that does not commit to specific dimensions, layouts, or configurations of turbines. This introduces considerable uncertainty and hampers the consistent application of a worst-case scenario analysis, thereby compromising the integrity of the assessment. As a result, the impacts outlined may not truly represent the final development, obstructing both the public and the competent authority from grasping the actual environmental effects involved.

Furthermore, the application is heavily reliant on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent on the premise that environmental harm will be managed at a later stage undermines meaningful evaluation of their effectiveness and precludes thorough assessment of residual impacts. This deferral of crucial information to stages following consent is procedurally unacceptable and contradicts the core purpose of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation measures must be clearly established prior to determination.

There are also notable gaps in evidence, which include shortcomings in baseline data, methodological limitations, and the use of assumptions in lieu of site-specific evidence. Such deficiencies lead to uncertainty concerning the scale and significance of impacts, especially where claims of negligible or non-significant effects are made without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that cannot satisfy statutory requirements.

Consequently, the application does not fulfil the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly regarding protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes stipulations on biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data culminate in an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings hinder a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information presented.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application presents significant shortcomings in the assessment of cultural heritage and community identity. It overlooks the West Lewis coastline as a dynamic cultural landscape, where environment, language, tradition, and community are interwoven. Instead of recognising heritage as a living entity, it is treated as a collection of separate, unchanging assets, ignoring their ongoing relevance in social, cultural, and spiritual contexts.

The treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, reveals another key weakness. These locations are not merely historical; they are active burial sites and places of spiritual significance. However, the assessment reduces them to static features, failing to acknowledge their current use and the implications of development on their surroundings. This misrepresentation leads to a partial understanding of cultural impacts and dismisses their importance to community life.

Furthermore, the assessment neglects intangible cultural heritage, including aspects such as the Gaelic language and local traditions. The strong connection between the community and its coastal environment is not addressed, despite being crucial to the area's identity. This omission hinders a complete understanding of the development's cultural impact.

Community rights and engagement are also inadequately addressed. The Gaelic-speaking population has a unique cultural identity, recognised as that of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent, which undermines the assessment's legitimacy and fails to honour established participatory principles in matters concerning cultural and environmental interests.

Additionally, there is a critical absence of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to properly evaluate the social, cultural, and economic consequences for the island community. This omission alone compromises the legality of the determination process.

From a policy standpoint, these gaps conflict with the National Planning Framework 4, especially regarding the safeguarding of historic assets and places. The failure to consider both tangible and intangible heritage, along with the disregard for living cultural practices, marks a clear deviation from necessary policy guidelines.

In conclusion, the combined failures to assess living heritage, intangible cultural values, community rights, and statutory obligations result in a notable evidential gap. The cultural impacts of the development remain inadequately evaluated, and the application lacks a solid foundation for assessing the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

The implications of this lack of transparency extend to the Environmental Impact Assessment process itself. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this scale, particularly when community character and functioning are at stake. The application does not provide the complete dataset necessary for a thorough assessment of the balance between benefits and harm.

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The proposed introduction of large-scale turbines close to the shoreline threatens to establish a continuous industrial presence that would irrevocably alter this landscape. The assessment provided does not adequately capture the significant visual changes that would arise, as the turbines

would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would directly affect visual amenity and detract from the essential qualities of naturalness and remoteness, while the assessment falls short in conveying the magnitude and significance of this impact on such a sensitive environment.

There are notable methodological flaws in how visual viewpoints have been selected and presented. Evidence points to the possibility that these viewpoints may not fully encompass the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact has been understated, calling into question the reliability of the overall assessment.

Additionally, the evaluation fails to recognise the interconnectedness of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these cultural assets in isolation, neglecting their interdependence and leading to an incomplete understanding of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever the existing relationships, fundamentally altering the context in which these heritage assets are perceived and disrupting their connection to the natural horizon. This signifies not merely a visual impact but a more extensive cultural and spatial harm that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The anticipated scale of change is incompatible with the essential need to protect landscape character, visual amenity, and the settings of culturally significant sites. The absence of a thorough worst-case assessment further undermines any assertions of policy compliance.

It is evident that the impacts identified cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be overwhelmingly dominant and unavoidable. Consequently, the changes anticipated are fundamental and permanent, incapable of being reduced to an acceptable level through mitigation measures.

In summary, the assessment fails to accurately portray the scale of impact, the sensitivity of the environment, and the intricate relationship between landscape and heritage. These shortcomings impede a reliable evaluation and strongly support the conclusion that the proposal is incompatible with the protection of this landscape.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and tourism. The proposed development introduces permanent red aviation lighting that would create an intrusive "wall of light" visible over long distances, fundamentally changing the night-time environment.

There is no assessment of how this lighting impacts visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning considering the significance of dark skies for the area's identity and for emerging sectors such as astro-tourism. The absence of these evaluations represents a serious gap in the landscape and environmental assessment.

Moreover, the application fails to evaluate the effects of artificial lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to such lighting, which can cause disorientation and increase the risk of collisions. The lack of a lighting impact assessment or phototaxis study means that the potential effects on these species and their mortality rates are not considered.

This deficiency is worsened by the use of daytime survey data in the ornithological assessment, which fails to capture nocturnal activity and related risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting. However, this risk has not been evaluated, and the absence of site-specific night-time data leaves a critical gap in understanding ecological impacts.

Without assessing nocturnal effects, it is impossible to determine if protected species or designated sites would suffer adverse effects. 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, which emphasises the protection of natural places and environmental quality. Additionally, it undermines the overall assessment of landscape and seascape impacts, as the night-time character is a vital aspect of the environment.

In summary, the lack of assessment regarding dark skies and nocturnal wildlife leads to 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 proposal lacks a thorough assessment of tourism impacts, neglecting to evaluate the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism is intrinsically linked to the area's wild coastline, nearly untouched landscapes, dark skies, and sense of remoteness. Despite the application noting that 86% of visitors are attracted by scenery, it fails to provide a quantified analysis of how extensive offshore infrastructure may influence visitor numbers, behaviours, or the

overall economic contributions.

Tourism on the Isle has seen remarkable 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. Nonetheless, the application does not evaluate how the potential industrialisation of the seascape and degradation of environmental quality could affect Tourism Gross Value Added or the broader economic resilience. Without this analysis, it is impossible to ascertain whether the development would yield a net economic benefit or jeopardise a vital and expanding sector.

Furthermore, the assessment overlooks the significance of environmental quality in enhancing tourism, which includes the value of unspoiled landscapes and dark skies for visitor experiences and emerging sectors such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a notable gap in understanding the impacts on a recognised and growing segment of the local economy.

Given the context of an island community with limited economic diversification, the inadequate assessment of tourism impacts raises broader concerns regarding employment, local businesses, and the sustainability of the community. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly evaluated, contravening requirements set out in the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not convincingly demonstrate alignment with the National Planning Framework 4, particularly concerning economic impact and the necessity to illustrate a net benefit. Additionally, it contradicts strategic objectives that prioritise tourism as a growth sector, and fails to present adequate evidence for the competent authority to evaluate the economic implications of the proposal.

In conclusion, the collective failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and consider the island's economic dependency creates a significant evidential gap. This hinders a thorough evaluation of economic effects and supports the determination that the application is incomplete.

SUMMARY

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

There are critical deficiencies in the evidential basis necessary for a thorough

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

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

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

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

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

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

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

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: 4BC1EFBC

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 marine licensing and Environmental Impact Assessment regimes. The objection is rooted in an examination of the Environmental Impact Assessment Report and the associated documents, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The development is proposed off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, nearly untouched environment, and rich cultural identity. The proposal's scale, design, and proximity to the shoreline raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation for a lawful decision. Essential environmental data is absent, baseline information is not only limited but also inconsistent, and critical elements of the proposal remain unspecified. The flexible design framework employed fails to allow for a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures leaves their effectiveness unverified. Consequently, the available documentation does not afford a comprehensive understanding of the environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack robust substantiation.

There are evident and substantial conflicts with policy. The proposal seems to contradict 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 adequately demonstrate compliance with national obligations to protect biodiversity, climate concerns, and environmental integrity. These conflicts directly impact the statutory requirements for consent and compromise the ability of the competent authority to ascertain the development's acceptability in policy terms.

The unprecedented scale of the project, with large turbines positioned in close proximity to the shoreline, raises significant issues related to landscape capacity, visual impact, and environmental effects. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy violations indicate that the application is incomplete and unable to support a lawful determination. In light of these factors, it is imperative that the precautionary principle is invoked.

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 assessment of the proposed development is fundamentally flawed, raising serious concerns about its reliability. It presents significant gaps in evidence and internal

inconsistencies that cast doubt on its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. Yet, the application fails to demonstrate to the necessary evidential standard that these species will not face adverse effects. Key foraging areas and migratory pathways, which are critical to these birds, are not adequately evaluated in terms of displacement, collision risk, or habitat loss.

A critical contradiction arises in the application itself, as the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only applicable if significant harm is anticipated. This inconsistency raises serious questions about the assessment's validity and suggests that the conclusions drawn are unsupported by the actual evidence presented. Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to protected sites such as the Lewis Peatlands and St Kilda will be unaffected. The significance of these feeding grounds is not properly acknowledged, and the reliance on modelling introduces further uncertainty, especially concerning species that are already in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly when baseline data is lacking and behavioural responses remain inadequately understood.

Additionally, the positioning of turbines within a recognised migratory corridor presents another substantial risk, effectively obstructing a primary flight path utilised by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor and potential effects on species with relatively small global populations are not sufficiently assessed by the application.

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 contradictory conclusions, alongside data gaps and limitations in modelling, prevents the standard of beyond reasonable scientific doubt from being achieved. This invokes the precautionary principle, which should inhibit a lawful conclusion in favour of consent.

The identified deficiencies also signify non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The lack of evidence to confirm that internationally important seabird populations will remain unaffected places the proposal at odds with national policy.

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. These shortcomings hinder a comprehensive evaluation of impacts and lead to the overarching conclusion that the application does not satisfy the statutory requirements essential for a lawful 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 of visual impacts associated with the proposed development is significantly lacking, failing to capture the true extent of the changes anticipated and

the sensitivity of the surrounding environment. The character of the West Lewis coastline is defined by its open view of the Atlantic and its undeveloped, remote nature. The proposed large-scale turbines would intrude upon this landscape, establishing an industrial presence that would irrevocably alter its character and result in a permanent transformation.

Furthermore, the evaluation does not accurately depict the magnitude of the visual alterations that would occur. Given the scale and proximity of the turbines, they would dominate the views from residential areas, historic locations, and popular coastal spots. This dominance would have a detrimental effect on visual amenity and diminish the essential qualities of naturalness and remoteness that define this area. The assessment's failure to adequately address the significance of these impacts in such a sensitive landscape is concerning.

Methodological flaws have also been identified regarding the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints chosen may not fully represent the most sensitive receptors or the most severe scenarios, especially concerning critical cultural heritage sites and valued landscapes. This oversight raises the possibility that the true scale of the visual impact has been underestimated, calling into question the reliability of the assessment's findings.

Additionally, the assessment does not adequately consider the interconnectedness of landscape, seascape, and cultural heritage. Key sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape context, linked visually and spatially to the Atlantic horizon. Treating these assets as isolated entities neglects their interdependence, resulting in an incomplete evaluation of the impacts on their cultural significance and setting.

The industrialisation of the seascape would disrupt these connections, altering the context within which heritage sites are appreciated and breaking their link to the natural horizon. This represents not only a visual impact but also a cultural and spatial harm that the application has not sufficiently addressed.

From a policy standpoint, the proposal contradicts the guidelines outlined in the National Planning Framework 4, particularly regarding the protection of natural landscapes and heritage sites. The extent of the proposed changes conflicts with requirements to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further compromises the proposal's compliance with established policy.

It is evident that the impacts highlighted cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable, resulting in fundamental and permanent changes that cannot be reduced to an acceptable level through mitigation measures.

In summary, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage.

These shortcomings hinder a trustworthy evaluation and reinforce the conclusion that the proposal is incompatible with the need to protect this landscape.

FISHERIES AND MARINE LIFE

The assessment fails to provide a strong evaluation of the ecological or socio-economic impacts on fisheries and marine life. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application does not prove that these uses and habitats can be protected or maintained without serious disruption.

A significant concern is the assumption that fishing activities can be moved without any consequences. The application lacks evidence that alternative fishing grounds are available, accessible, or able to handle additional pressure. This lack of information is crucial, as displacement could lead to overfishing in other areas and might have broader economic implications for the local fishing fleet. Without a clear, evidence-based assessment, it is impossible to understand the impacts on fisheries and local livelihoods.

The proposal also poses considerable risks to marine species, particularly due to the underwater noise produced during construction. High-energy hammer piling over an extended duration is expected to cause disturbances over large areas, affecting species such as dolphins. The predicted disturbance to a significant part of the local bottlenose dolphin population raises serious concerns, yet the application minimizes the importance of these effects without adequate supporting evidence.

Moreover, there is an inconsistency in the application regarding the necessity for licences to allow harm to European Protected Species, while simultaneously describing impacts as negligible. This contradiction undermines the assessment's credibility and raises issues concerning compliance with the Habitats Regulations, especially where harm is expected to a level that requires legal approval.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents a fragmented assessment of onshore infrastructure, failing to acknowledge the interconnected nature of the offshore turbines and onshore works. This separation obscures the complete environmental and socio-economic impacts that arise from what is fundamentally a single integrated project. The onshore components involve significant activities, including cabling across protected moorland and the construction of a substation near Stornoway, alongside access infrastructure through sensitive landscapes. Notably, excavation will occur in areas of deep peat, particularly within Barvas Moor, which is a critical carbon store and ecologically sensitive habitat. The current application lacks a thorough examination of these effects, leading to an incomplete understanding of the overall environmental footprint of the project.

By choosing to exclude or delay the assessment of onshore impacts, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project be considered together. However, the disjointed treatment of offshore and onshore elements means that the combined implications for peatlands, habitats, and local communities remain unclear.

Moreover, there are considerable risks to sensitive habitats such as machair systems and peatland environments, which enjoy policy protection. The application does not sufficiently demonstrate that impacts on these vital ecosystems have been adequately assessed or that effective avoidance measures have been put in place, revealing a significant gap in evidence concerning biodiversity protection.

Concerns are also raised regarding the carbon balance associated with the proposal. The disturbance of peatland releases stored carbon, which could result in a carbon debt that contradicts the renewable energy development objectives. The application fails to address this matter adequately or to show that the overall carbon balance is indeed beneficial.

The routing of infrastructure through active croft land introduces further potential conflicts with established land use and legal rights. There is no evidence presented that the requisite consents or processes have been initiated, casting doubt on both the deliverability and lawful implementation of the project.

From a policy standpoint, the lack of a comprehensive assessment and failure to demonstrate the protection of peatlands, habitats, and land use interests stand in direct conflict with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated fundamentally weakens the application.

In summary, the division of project components, absence of thorough assessment, and lack of evidence concerning environmental and land use impacts culminate in an application that is incomplete and unreliable, thereby obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal fails to adequately evaluate the potential impacts of permanent red aviation lighting, which will be visible over long distances and create a pervasive “wall of light” effect across the western horizon. This intrusion will irrevocably change the night-time environment, a crucial aspect of the West Lewis coastline, which is distinguished by its exceptionally dark skies. These dark skies are not only vital for environmental quality but also play an important role in the cultural identity of the area and its burgeoning tourism sector, including astro-tourism.

There is a notable absence of assessment concerning the effects of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly significant given how critical dark skies are to the identity of the region. Furthermore, the application does not address the impacts on nocturnal wildlife, which is a severe shortcoming. Nocturnal species, such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, exhibit sensitivity to artificial lighting, with risks of disorientation and increased collision rates. The lack of a lighting impact assessment or phototaxis study means there is no evaluation of how aviation lighting could affect these species or contribute to mortality rates.

Compounding this issue is the reliance on daytime survey data in the ornithological assessment, which inadequately captures the nocturnal activity and associated hazards. Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk remains unassessed. The absence of site-specific night-time data leaves a substantial gap in understanding the ecological impacts involved.

Without a thorough assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would be adversely impacted. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt is not met, which invokes the precautionary principle and obstructs a lawful determination.

From a policy standpoint, this omission contravenes the National Planning Framework 4 regarding the protection of natural areas and environmental quality. Additionally, it undermines a comprehensive evaluation of landscape and seascape impacts, as the character of the night-time environment is a fundamental aspect of the overall setting.

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

TOURISM

The application under consideration presents a concerning deficiency in its assessment of tourism impacts, which are crucial to the economy of the Isle of Lewis.

Tourism is a vital sector, heavily reliant on the island's unspoiled coastline, stunning landscapes, dark skies, and overall sense of remoteness. Although the application acknowledges that a staggering 86% of visitors are attracted by the scenery, it fails to provide a quantified evaluation of how the proposed large-scale offshore infrastructure could influence visitor numbers, their behaviours, or the overall economic contributions they make.

The significance of tourism on the island cannot be overstated, with growth reported from £65 million in 2017 to over £81.5 million, contributing to the support of more than 1,000 jobs and accounting for up to 16% of the local economy. However, the application neglects to model the potential impacts of industrialising the seascape and the associated loss of environmental quality on the Tourism Gross Value Added, as well as on the broader economic resilience of the region. In the absence of this critical analysis, it remains unclear whether the proposed development would yield a net economic benefit or rather threaten an already established and flourishing sector.

Moreover, the assessment disregards the critical role of environmental quality in sustaining tourism. Unspoiled landscapes and dark skies enhance visitor experiences, particularly in emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, creating a significant gap in understanding the impacts on this recognised and expanding segment of the local economy.

Given that the island community has limited economic diversification, the failure to assess the impacts on tourism carries broader implications for local employment, businesses, and overall community sustainability. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been appropriately evaluated as mandated by the Islands (Scotland) Act 2018.

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

All these factors combine to illustrate the absence of a robust quantification of tourism impacts, an inadequate assessment of environmental drivers influencing visitor behaviour, and a disregard for the island's economic dependencies. This results in a critical evidential gap that hampers a thorough evaluation of the economic effects, ultimately 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 when evaluated against statutory duties and national policy. It shares significant issues with the 2008 Lewis Wind Power proposal, which was rejected due to unacceptable industrialisation. Now, it is put forward under

a more robust policy framework that places greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

The application lacks a complete and reliable evidential basis. There are serious gaps in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and omitted key impact pathways, including nocturnal wildlife, full onshore infrastructure, and tourism effects. The Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

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

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

Environmental risks remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in places. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been met, thus invoking the precautionary principle and preventing a lawful 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 negative impacts on tourism represent permanent effects that cannot be adequately mitigated.

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

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

Additional Comments

As someone who has visited Lewis a number of times to be inspired by its open landscapes and seascapes I am appalled that this application is being given serious consideration.

As well as the substantial reasons given, Scotland produces more renewable power than it uses and derives very little benefit. Which by no means is worth the destruction that will be caused, not only locally in the Outer Hebrides, but right down to the border with England as more unnecessary infrastructure is put in place to enable it. As one living near Beaulieu, the epicentre in the Highlands of this extraneous ironmongery, it is completely unjustifiable.

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: 9BFA11BD

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 regimes. A review of the Environmental Impact Assessment Report and its supporting documentation highlights numerous material deficiencies across planning, environmental, cultural, and procedural dimensions. The proposed development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, nearly pristine environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the proposal, which appear fundamentally incompatible with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis for a lawful determination, as critical environmental data is absent, baseline information is both limited and inconsistent, and significant aspects of the proposal remain undefined. The use of a flexible design framework creates ambiguity around likely significant effects, while the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

Furthermore, the proposal exhibits clear and substantive policy conflicts, appearing inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency is particularly evident concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests necessary for consent and hinder the competent authority's ability to conclude that the development aligns with policy standards.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to provide a comprehensive, transparent, or dependable analysis of the potential environmental impacts of the proposal. The adoption of a flexible Project Design Envelope, which lacks a commitment to specific turbine dimensions, layouts, or configurations, introduces a substantial degree of uncertainty. This approach hinders a consistent evaluation of the worst-case scenario, undermining the assessment's integrity and obstructing both public understanding and that of the competent authority regarding the actual extent of environmental effects.

Furthermore, the application is heavily dependent on mitigation measures, management plans, and monitoring strategies that remain undefined. Consent is sought on the premise that any environmental harm will be managed at a later stage, which obstructs any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent phases is not procedurally acceptable and contravenes the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly delineated before determination.

There are also notable evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions in place of site-specific evidence. Such issues result in uncertainty regarding the scale and significance of the impacts, especially where conclusions of negligible or non-significant effects are asserted without adequate supporting data. The lack of sufficient information impedes a clear comprehension of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory obligations.

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

In summary, the reliance on an ambiguous design envelope, the absence of clearly defined mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings hinder a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make a determination based on the provided information.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives presented in this application is inadequate and fails to meet the necessary statutory requirements of the Environmental Impact Assessment regime. Rather than offering a well-structured comparison of realistic alternatives based on environmental effects, the application provides a narrative of project evolution. This lack of analysis does not demonstrate that less harmful options have

been properly identified, assessed, and selected over more damaging solutions.

In particular, there is no clear or evidence-based comparison of various offshore locations, development scales, or design configurations. The application does not show that the developer has seriously considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be reduced. The sensitivity of the West Lewis coastline, along with the critical importance of proximity to shore in determining impact, underscores the necessity for this analysis. The absence of such consideration undermines any claim that the proposed siting is the least damaging option available.

Furthermore, these shortcomings extend to the assessment of cable routing and landfall, as there is insufficient evidence that alternative routes have been adequately explored to minimise impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and failure to conduct comparative analysis suggest that mitigation by design has not been employed, with a reliance instead on post-design mitigation measures.

As a consequence, the application does not demonstrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy prevents the competent authority from determining whether more appropriate and less harmful alternatives exist. The absence of a robust alternatives assessment further casts doubt on the sustainability and policy compliance of the proposal.

From a policy standpoint, this inadequacy undermines adherence to National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species has significant deficiencies that compromise its reliability and completeness. The West Lewis coastal environment is biologically active and sensitive, yet the baseline data collected is insufficient. The methodologies used do not adequately capture the presence, behaviour, and habitat usage of various species, leading to a lack of sound evidence for assessing potential impacts.

One major oversight is the treatment of otters, which are recognised as a European Protected Species. The application does not properly acknowledge their active use of coastal areas for foraging and movement. Ignoring their core foraging range and behavioural habits means that the assessment fails to evaluate the impacts of construction disturbance, noise, and increased human activity on these animals. This gap undermines any conclusions drawn about the absence of significant effects on

otters.

There are also substantial weaknesses in the assessment of basking sharks, where reliance on aerial surveys can lead to significant detection bias, particularly under Atlantic conditions. This methodology likely underrepresents the presence of basking sharks, especially when compared to established land-based observations that indicate frequent utilisation of these waters. The failure to integrate or adequately consider such crucial data further contributes to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological flaws result in conclusions regarding negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data obstructs a proper evaluation of cumulative and indirect impacts, seasonal variations, and the interactions within the wider ecosystem. This adds uncertainty concerning the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to accurately identify and assess protected species. The uncertainty introduced by these deficiencies precludes the possibility of confidently excluding adverse effects, thus invoking the precautionary principle. In light of these issues, granting consent would not be lawful.

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, ultimately leading to the conclusion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment conducted is deeply flawed and presents critical gaps in evidence that raise serious concerns about its validity. Located in key foraging areas and migratory pathways, the site of the proposed development has significant implications for internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already experiencing declines. Alarming, the application fails to provide the necessary evidence that these vulnerable species will not be adversely affected.

A troubling contradiction arises within the application itself, wherein the developer asserts that there will be no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case. Such a case is typically only put forward when significant harm is anticipated, which casts doubt on the overall reliability of the assessment and suggests that its conclusions are not adequately supported by the evidence provided. Furthermore, the assessment inadequately addresses the potential impacts on seabirds associated with protected areas, including the Lewis Peatlands and St Kilda. The critical nature of these feeding grounds has not been sufficiently

recognised, and the reliance on modelling techniques introduces considerable uncertainty, particularly for species such as Kittiwakes and Fulmars that are in steep decline.

The siting of turbines within an established migratory corridor presents additional risks, effectively serving as a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. There is a notable lack of thorough evaluation regarding the long-term effects of sustained mortality in this corridor, particularly concerning species with smaller global populations.

From a regulatory standpoint, the application does not meet the evidential threshold required to affirm that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations of the modelling, indicates that the assessment has not reached the standard of beyond reasonable scientific doubt. This situation activates the precautionary principle and hinders a lawful conclusion that could support consent.

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

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological shortcomings, and lack of robust evidence. These flaws obstruct a thorough evaluation of the potential impacts and lead to the conclusion that the application does not fulfil the statutory requirements necessary for a proper determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment presented in the application significantly underrepresents the cultural heritage and community identity associated with the West Lewis coastline. This area should be recognised as a living cultural landscape, where the environment, language, tradition, and community are fundamentally interconnected. Instead, the application adopts a reductive viewpoint, treating heritage merely as a collection of isolated and static assets, neglecting to acknowledge their ongoing social, cultural, and spiritual significance to the community.

A notable shortcoming is the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice; however, they are mischaracterised in the assessment as static features. This oversight disregards their continued use and meaning, as well as the implications of development on their setting. Such a misrepresentation leads to an inadequate evaluation of cultural impacts, ignoring the essential role these sites play in community life.

Moreover, the assessment overlooks intangible cultural heritage elements, including the Gaelic language and traditions, along with the long-standing relationship the community has with the coastal environment. These factors are integral to the area's identity, yet they 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 engagement. The Gaelic-speaking population, recognised as possessing a distinct cultural identity akin to that of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and fails to align with established principles of participation in matters affecting cultural and environmental interests.

Furthermore, a critical procedural error is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The failure to conduct this assessment inhibits the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission is significant enough to prevent a lawful determination regarding the application.

From a policy standpoint, these inadequacies place the proposal at odds with the National Planning Framework 4, particularly concerning the protection of historic assets and sites. The oversight in considering both tangible and intangible heritage, alongside the disregard for living cultural practices, represents a clear deviation from the stipulated policy requirements.

Overall, the lack of assessment of living heritage, intangible cultural values, community rights, and adherence to statutory obligations creates a substantial evidential gap. The cultural impacts of the development have not been thoroughly examined, and the application does not provide an adequate foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency in assessing social impacts, health, and wellbeing is a significant concern. The developer's Social Impact Assessment included focus groups with local residents, yet the complete report remains unpublished. This creates a considerable gap in evidence, hindering both public understanding and the competent authority's ability to assess the full range of social risks identified in the developer's research.

Summaries indicate that local residents are experiencing stress, anxiety, and concern related to the proposal's scale and proximity. These impacts stem from direct engagement and are based on actual feedback, not speculation. However, without access to the full assessment, scrutiny of these findings is limited, making it difficult to gauge their significance in the decision-making process.

Additionally, there is evidence that the proposal threatens community identity and cohesion, as “cultural loss” has been identified in the developer's findings. Despite this acknowledgment, the impacts have not been adequately incorporated into the main application or given the necessary consideration. The absence 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. Understanding the social, economic, and health impacts is crucial for developments of this nature, particularly when community character and functioning are at stake. The failure to provide the complete dataset means the application does not offer a comprehensive evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not show compliance with National Planning Framework 4 regarding health and wellbeing. Developments should promote positive health outcomes and minimise harm, yet the existing evidence points to adverse effects that have not been fully revealed. Without the complete assessment, it is impossible to demonstrate compliance with this policy.

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 omission is material and fails to meet the evidential standards required by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

Concerns also arise regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not capture the most

sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This oversight risks understating the visual impact's magnitude and calls into question the reliability of the assessment.

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment surrounding construction and pollution risks remains insufficient, lacking the necessary detail to accurately gauge potential environmental effects. This proposal entails significant seabed preparation and installation activities within a high-energy Atlantic setting. However, it fails to present comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures to be developed after consent, which inhibits any meaningful assessment of their effectiveness or adequacy.

Particularly alarming is the reliance on undefined future measures, given the sensitivity of the receiving environment. The West Lewis coastline features clean coastal waters

and vital habitats that are susceptible to contamination and sediment disturbance. While the application notes risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it does not provide adequate detail on preventative, controlling, or monitoring measures.

Moreover, there exists a level of uncertainty concerning the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and explicitly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also applies to potential repercussions on marine species and habitats 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 obstructs the evaluation of whether suitable safeguards are established to manage pollution incidents. This introduces procedural risks and weakens the capacity of the competent authority to evaluate environmental protection measures prior to the decision-making process.

From a regulatory standpoint, the deferral of essential environmental safeguards stands in conflict with the requirements set by the Environmental Impact Assessment regime. Significant effects and corresponding mitigations must be appraised before consent is granted, and the absence of such information renders any lawful determination impossible. Furthermore, the application does not demonstrate compliance with policy stipulations concerning environmental protection and water quality.

When considering the absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts, it becomes clear that the assessment is materially deficient. These issues hinder a thorough evaluation of construction and pollution risks and collectively support the view that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment related to fisheries and marine life is profoundly inadequate, lacking a thorough evaluation of the ecological and socio-economic effects. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a bustling fishing industry. However, the application does not provide assurance that these vital uses and habitats will be safeguarded or maintained without substantial disruption.

A critical concern arises from the assumption that fishing activities can simply be displaced without repercussions. The application fails to present any evidence that alternative fishing grounds are available, accessible, or capable of accommodating additional pressure. This significant gap in the assessment raises the risk of overfishing in other areas and could have broader economic repercussions for the local fishing fleet. Without a clear, evidence-based analysis, the potential impacts on fisheries and

livelihoods remain poorly understood.

Moreover, the proposal poses serious risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling anticipated over an extended duration is likely to disturb marine life across considerable distances, especially species such as dolphins. The predicted disturbance to a considerable segment of the local bottlenose dolphin population is alarming, yet the application minimizes the seriousness of these effects, lacking sufficient evidence to support its claims.

There is a troubling inconsistency within the application where the need for licenses to permit harm to European Protected Species is acknowledged, while simultaneously describing the impacts as negligible. This contradiction severely undermines the credibility of the assessment and raises alarming questions regarding compliance with the Habitats Regulations, especially where harm is anticipated to an extent that necessitates legal authorisation.

Additionally, the assessment neglects to consider the cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. 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 adherence to the National Planning Framework 4 or the National Marine Plan. It does not show that the development can coexist harmoniously with existing marine users or avoid unacceptable impacts on marine biodiversity, thus preventing any conclusion that the proposal aligns with the principles of sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves the development of onshore infrastructure linked to offshore turbines, yet the assessment provided is materially incomplete. This fragmented approach, which treats the offshore and onshore components separately, fails to capture the full extent of environmental and socio-economic impacts associated with this single integrated project. The onshore works include cabling across protected moorland, construction of a substation near Stornoway, and the creation of associated access infrastructure, all of which traverse sensitive landscapes. Notably, these activities entail excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

Furthermore, the failure to assess onshore impacts either fully or in a timely manner prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively. However, the current separation of the offshore and onshore elements obscures the combined impacts on peatlands, habitats, and local communities. This oversight poses significant risks to sensitive habitats, including machair systems and peatland environments that are protected by policy. The application does not sufficiently demonstrate that the effects on these habitats have been thoroughly evaluated or that suitable avoidance measures are in place, creating a notable evidential gap regarding biodiversity protection.

The proposal additionally raises serious concerns about carbon balance. The disturbance of peatland could release stored carbon, potentially resulting in a carbon debt that contradicts the principles of renewable energy development. The application fails to adequately address this crucial issue or show that the overall carbon balance remains favourable. Moreover, the routing of the infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. There is insufficient evidence that the necessary consents or processes have been initiated, raising significant questions about the project's deliverability and lawful implementation.

From a policy standpoint, the project's failure to assess it comprehensively and to ensure 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 adverse impacts can be avoided or mitigated further undermines the reliability of the application. In summary, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and untrustworthy, which ultimately prevents a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is missing an assessment of dark skies and nocturnal wildlife, which is a significant omission. The West Lewis coastline is known for its exceptionally dark skies, which contribute to the area's environmental quality, cultural identity, and tourism value. The proposed development would introduce permanent red aviation lighting that can be seen from long distances, creating a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

The application does not evaluate how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly important due to the value of dark skies for the local identity and the growing tourism sector focused on astro-tourism. The lack of consideration for these impacts represents a clear gap in the overall assessment of the landscape and environment.

More importantly, there has been no evaluation of how nocturnal wildlife will be affected. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collisions. The application fails to include any assessment of lighting impacts or a phototaxis study, and thus does not address how aviation lighting may affect these species or raise mortality rates.

This issue is exacerbated by the use of daytime survey data in the ornithological assessment, which does not account for nocturnal activity or related risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The absence of specific night-time data creates a significant gap in understanding the ecological impacts.

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

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

In summary, the lack of any assessment of dark skies and nocturnal wildlife creates a significant 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 fails to adequately assess the impacts on tourism, a key sector for the Isle of Lewis economy, and does not evaluate the economic and social consequences associated with this area. Tourism in the region relies heavily on its wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it provides no quantified assessment of how large-scale offshore infrastructure might affect visitor numbers, behaviour, or the overall economic contribution of this sector.

Tourism has seen remarkable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application does not model the potential impacts of the industrialisation of the seascape and the resultant loss of environmental quality on Tourism Gross Value Added or the broader economic resilience of the island. The lack of such analysis hinders the ability to ascertain whether the proposed development would yield a net economic benefit or harm this vital and expanding sector.

Furthermore, the assessment neglects the significant role of environmental quality in

underpinning tourism, including the critical nature of unspoiled landscapes and dark skies for visitor experience, as well as the emerging markets of nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment only exacerbates this inadequacy, creating a considerable gap in understanding the impacts on this recognised and growing part of the local economy.

In an island community that faces limited economic diversification, the oversight regarding tourism impacts raises broader concerns for employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated as stipulated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impacts and the necessity to exhibit net benefits. It also contradicts strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to effectively assess the economic ramifications of the proposal.

In summary, the failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and acknowledge the island's economic dependency leads to a significant evidential gap. This shortcoming prevents a thorough 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 regarding its compliance with sustainable development principles when evaluated against statutory obligations, national policy, and evidential requirements. It mirrors the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. This current proposal, despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, fails to adequately address these critical issues.

There are significant shortcomings in the evidential basis for the application. It lacks comprehensive baseline data, utilises an undefined design envelope, and relies on unspecified mitigation measures. Key impact pathways, particularly regarding nocturnal wildlife, the entirety of onshore infrastructure, and tourism effects, have been overlooked. As a result, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of the likely significant effects or residual impacts.

Furthermore, there are evident procedural deficiencies. The absence of a compliant Island Communities Impact Assessment contravenes the statutory duties outlined in the Islands (Scotland) Act 2018, while the omission of the full Social Impact Assessment represents a material oversight. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal stands in direct contradiction to National Planning Framework 4. It does not sufficiently demonstrate the protection of biodiversity, natural habitats, or cultural heritage. Additionally, it 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. Moreover, the cumulative impacts of offshore and onshore elements have not been adequately assessed, clouding the understanding of effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain instances, inconsistent. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, activating the precautionary principle and barring a lawful conclusion on the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, coupled with conflicts with policy and unresolved environmental risks, hinder the ability to make a lawful and evidence-based decision. It is imperative that the competent authority either refuse consent based on these grounds or invoke the necessary regulatory provisions to mandate the submission of the required information.

Therefore, I formally request that the application for the Spiorad na Mara Offshore Wind Farm is refused in its entirety.

Additional Comments

I am the child of parents both of whom were born and brought up in Lewis. Many of my relatives still live on the island.

I have spent hundreds of days and nights in Lewis down the years. My mother and sister and an aunt live there. 11 first cousins and their families live there.

The scale and nature of the proposed development completely fails to take into account the irreversible damage it will cause to the social and natural fabric of the island.

The proposed development is simply a slightly offshore rehash of the equally wrong onshore proposal from years ago. On balance and taking all factors into account it has no merit and should be rejected.

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: B3DC5007

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The concerns raised stem from a thorough examination of the Environmental Impact Assessment Report and associated documents, highlighting significant planning, environmental, cultural, and procedural shortcomings. The proposed development is situated off the west side of the Isle of Lewis, a region known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The size, location, and design of the project raise critical questions about its alignment with statutory obligations, national policy, and the principles of sustainable development.

The application is lacking in sufficient evidential support for a lawful determination. Essential environmental data is absent, baseline information is sparse and inconsistent, and key components of the proposal are not clearly defined. The flexible design framework used inhibits a proper understanding of potential significant effects, and the reliance on unspecified mitigation measures prevents any assessment of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community effects, and assertions of negligible or insignificant impacts are not backed by solid evidence.

There are evident and serious conflicts with policy. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests necessary for consent and compromise the ability of the competent authority to conclude that the development is acceptable according to policy.

The unprecedented scale of the project raises significant issues, with large turbines proposed in close proximity to the shoreline, which could have substantial implications for landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. Under these conditions, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a comprehensive and transparent overview of the expected environmental effects of the proposed project. The employment of a flexible Project Design Envelope, which does not commit to specific turbine sizes, layouts, or configurations, introduces considerable uncertainty and hinders the application of a worst-case scenario analysis. This deficiency compromises the assessment's integrity, resulting in a lack of clarity for both the public and the competent authority regarding the actual environmental impacts that may arise from the development.

Furthermore, the application is predicated on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under such circumstances implies that environmental harm will be rectified post-approval, thus obstructing any substantive evaluation of the efficacy of these measures or the assessment of residual impacts. This postponement of essential information to a later stage not only contravenes the procedural norms but also undermines the objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation must be adequately detailed before a decision is made.

There are also critical evidential shortcomings, including insufficient baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, especially where findings of negligible or non-significant effects are presented without strong supporting data. The lack of adequate information results in an unclear understanding of cumulative and worst-case impacts, fostering scientific uncertainty that fails to comply with statutory requirements.

Consequently, the application does not satisfy the evidential standards outlined in the Habitats Regulations necessary to rule out adverse effects with reasonable scientific certainty. This invokes the precautionary principle, particularly in relation to protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, failing to show that impacts have been thoroughly assessed or that suitable safeguards are in place regarding biodiversity protection and environmental integrity.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species is significantly lacking, leading to an incomplete and unreliable understanding of the ecological receptors in the West Lewis coastal environment. This area is known to be highly sensitive and biologically

active, yet the data collected is insufficient, and the methodologies used do not adequately capture the presence, behaviour, and habitat utilisation of the species involved. Consequently, the assessment fails to provide a solid evidential foundation for evaluating potential impacts.

One major oversight concerns otters, which are classified as a European Protected Species. The application does not sufficiently recognise or assess their active use of coastal areas for foraging and movement. The lack of analysis surrounding their core foraging range and behavioural patterns means the potential effects of construction-related disturbances, noise, and increased activities have not been adequately evaluated. This oversight undermines any claims regarding the lack of significant effects on this species.

In addition to the issues with otters, the assessment of basking sharks reveals further deficiencies. The reliance on aerial surveys introduces a significant detection bias, especially in the conditions commonly found in the Atlantic. This approach likely leads to an underestimation of their presence, particularly when compared to established land-based observations that indicate these waters are frequently used by basking sharks. The failure to incorporate or properly consider relevant data results in an incomplete baseline and detracts from the reliability of the conclusions drawn.

These methodological flaws mean that the assessment's conclusions about negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of sufficient baseline data also hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and interactions within the broader ecosystem. This introduces uncertainty regarding the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the necessary criteria of 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, thus invoking the precautionary principle. Under these circumstances, consent cannot be legally granted.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions makes the assessment unreliable. These shortcomings inhibit 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 west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already in decline. Despite this, the application does not adequately demonstrate that these species will not face adverse effects from the proposed development. The site is situated within critical foraging areas and migratory routes, yet the ornithological assessment fails to thoroughly evaluate potential risks

such as displacement, collision, and habitat loss.

A serious inconsistency is present in the application, where the developer claims there will be no significant adverse effects while also advancing a Habitats Regulations derogation case, which should only be necessary if significant harm is anticipated. This contradiction undermines the reliability of the assessment and raises doubts about the support that exists for its conclusions based on the underlying evidence.

Furthermore, the assessment does not provide adequate proof that seabirds linked to protected areas like the Lewis Peatlands and St Kilda will remain unaffected. The crucial nature of these feeding grounds is not sufficiently acknowledged, and the reliance on modelling introduces uncertainty, particularly for declining species such as Kittiwakes and Fulmars. The methodologies employed may underestimate mortality rates due to incomplete baseline data and a lack of understanding regarding species' behavioural responses.

The placement of turbines in a recognised migratory corridor poses a significant risk, creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently consider the long-term consequences of continuous mortality within this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application fails to meet the necessary evidential threshold to assert that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, combined with gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and renders a lawful conclusion in favour of consent unattainable.

These identified deficiencies also signify a breach of National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The failure to conclusively demonstrate that internationally important seabird populations will not be adversely affected places the proposal in opposition to national policy.

In summary, the assessment is unreliable due to its internal inconsistencies, methodological shortcomings, and lack of sufficient evidence. These issues hinder a rigorous evaluation of the impacts, leading to the overall conclusion that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are connected. It adopts a reductive approach by treating heritage as isolated, static assets rather than acknowledging their social, cultural, and spiritual roles within the community.

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

active places for burial and spiritual practice. However, the assessment categorises them as static features, overlooking their continued use and meaning. This mischaracterisation results in an incomplete evaluation of cultural effects and ignores their significance within community life.

Additionally, the assessment does not consider intangible cultural heritage, including the Gaelic language, traditions, and the relationship between the community and the coastal environment. These elements are crucial to the area's identity but are entirely absent from the assessment. As a result, the cultural impact of the development remains poorly understood.

There are also concerns about community rights and engagement. The Gaelic-speaking population has a distinct cultural identity that is recognised as characteristic of an Indigenous People. However, no process of Free, Prior and Informed Consent has been conducted. This lack of meaningful engagement undermines the assessment's legitimacy and fails to adhere to established principles of participation in decisions that affect cultural and environmental interests.

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

From a policy perspective, these issues place the proposal in conflict with National Planning Framework 4, especially regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage, as well as living cultural practices, represents a clear departure from policy requirements.

Overall, the lack of assessment of living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately assessed, and the application fails to provide a sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The analysis of social impacts, health, and wellbeing associated with the proposal is fundamentally flawed and lacks the requisite transparency for a lawful assessment. Although the developer commissioned a Social Impact Assessment that included engagement with local residents through focus groups, the full report remains unpublished. This lack of disclosure creates a significant evidential gap, hindering both public understanding and the competent authority's ability to evaluate the social risks highlighted by the developer's own research.

Summaries that are available reveal that local residents are currently facing notable levels of stress, anxiety, and concern linked to the proposal's scale and proximity.

These effects stem from direct interactions and are therefore based on concrete evidence rather than speculation. The failure to make the complete assessment available undermines rigorous scrutiny of these findings and restricts the capacity to assess their relevance in the decision-making process.

Moreover, there is a notable perception that the proposal poses a direct threat to community identity and cohesion, with the developer's own findings acknowledging a potential "cultural loss." Despite this, such impacts have not been sufficiently integrated into the main application nor afforded the appropriate consideration. The absence of the complete Social Impact Assessment thus conceals the actual human and social costs of the proposed development.

This lack of transparency has serious implications for the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for projects of this magnitude, especially when community character and functionality are at risk. By withholding the complete dataset, the application fails to establish a comprehensive evidential foundation necessary for assessing the balance between benefits and detriments.

From a policy standpoint, the application does not illustrate adherence to the National Planning Framework 4 regarding health and wellbeing. Development should facilitate positive health outcomes and mitigate harm; however, the evidence at hand suggests there are existing adverse effects that remain undisclosed. Without access to the full assessment, the demonstration of compliance with this policy is unattainable.

The procedural ramifications of this situation are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a significant omission within the application and a failure to satisfy the evidential obligations of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of pre-existing adverse impacts, results in an incomplete and unreliable assessment. This inadequacy precludes a lawful determination and reinforces the position that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

Moreover, the application fails to adequately depict the extent of the anticipated visual changes. Given the scale and proximity of the turbines, they would overshadow views from residential areas, historic sites, and popular coastal locations. This would directly diminish visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment does not sufficiently illustrate this impact or its significance within the context of such a sensitive landscape.

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment regarding construction and pollution risks lacks essential detail required for evaluating potential environmental effects. This proposal necessitates significant seabed preparation and installation operations 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 are to be developed after consent, which impedes any meaningful evaluation of their adequacy or effectiveness.

This reliance on unspecified future measures is particularly alarming due to the sensitivity of the surrounding environment. The coastline of West Lewis is home to clean coastal waters and vital habitats that are at risk from sediment disturbance and contamination. While the application acknowledges risks like sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to furnish sufficient information on the methods for prevention, control, or monitoring of these risks.

Moreover, there is ambiguity concerning the scale and behaviour of sediment plumes resulting from seabed disruption and cable installation. Without thorough modelling and well-defined management strategies, it becomes impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also pertains to potential effects on marine species and habitats identified as sensitive within the broader assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning to a post-consent phase, the application hinders the evaluation of whether adequate safeguards are in place to address pollution incidents. This introduces procedural risks and weakens the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of crucial environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated prior to consent, and the absence of such information renders lawful determination impossible. The application also fails to prove compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal introduces substantial risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is likely to disturb marine life across significant distances, with concerns specifically raised about the local bottlenose dolphin population. The

application appears to downplay the severity of these effects, lacking sufficient supporting evidence to justify this minimisation.

Furthermore, the assessment of fisheries and marine life is inadequate and does not offer a comprehensive evaluation of the ecological or socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application fails to demonstrate how these uses and habitats can be protected or maintained without substantial disruption.

A critical issue lies in the assumption that fishing activity can be displaced without repercussions. The application does not provide evidence that alternative fishing grounds are available, accessible, or capable of accommodating additional pressure. This lack of information is troubling, as it raises the risk of overfishing in other areas and may lead to wider economic consequences for the local fishing fleet. Without a clear and evidence-based assessment, the implications for fisheries and local livelihoods cannot be properly understood.

There is also a notable inconsistency within the application. While the need for licences to permit harm to European Protected Species is acknowledged, impacts are simultaneously described as negligible. This contradiction undermines the credibility of the assessment and raises significant concerns regarding compliance with the Habitats Regulations, especially when harm is expected to a level that requires legal authorisation.

Additionally, the assessment neglects to address cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. A comprehensive evaluation of these combined effects is crucial; otherwise, the overall impact on marine ecosystems and socio-economic conditions remains indeterminate.

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

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

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 lacks essential evaluation, overlooking the economic and social ramifications for a crucial sector of the Isle of Lewis economy. The tourism industry relies heavily on the area's unspoilt landscapes, wild coastline, dark

skies, and overall sense of remoteness. Although the application states that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure might alter visitor numbers, behaviour, or their overall economic contribution.

Since 2017, tourism has seen notable growth, rising from £65 million to over £81.5 million and supporting more than 1,000 jobs while constituting up to 16% of the island's economy. However, the application does not assess how the industrialisation of the seascape and the subsequent loss of environmental quality would impact Tourism Gross Value Added or the broader economic resilience of the area. Without this critical analysis, it remains unclear whether the proposed development would yield a net economic benefit or jeopardise a vital and expanding sector.

Moreover, the assessment neglects to consider the significance of environmental quality in attracting tourists, including the role of unspoiled landscapes and dark skies in enhancing visitor experiences. This is particularly relevant for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, creating a significant gap in understanding the effects on a recognised and developing facet of the local economy.

Given the context of an island community with limited economic diversification, the neglect to evaluate tourism impacts carries broader implications for employment opportunities, local businesses, and community sustainability. The absence of a proper Island Communities Impact Assessment means these economic vulnerabilities have not been examined as stipulated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately illustrate compliance with National Planning Framework 4, especially concerning economic impact and the necessity to demonstrate net benefit. It also stands in conflict with strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence to enable the competent authority to assess the economic ramifications of the proposal.

In summary, the cumulative failure to quantify tourism impacts, evaluate the environmental factors that influence visitor behaviour, and acknowledge the island's economic reliance culminates in a substantial evidential gap. This deficiency hampers a thorough evaluation of the economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements for sustainable development when evaluated against statutory duties and national policy. This application echoes the key issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being presented under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application lacks a comprehensive evidential basis for evaluation.

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

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

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

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

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

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

Additional Comments

I am writing to give my strong objection to the N4 proposal. We on the West side of Lewis have made our objections clear for many years, however are not being listened to. The proposal states there was strong local support for the project. This is untrue. Local consultation commenced at the time of the Covid-19 lockdowns and no attempt was made to rectify or renew options for locals to give their views.

This development will be catastrophic for Lewis. The damage done will never be

repaired. We will lose our dark skies, tranquility, beautiful unspoilt environment. Whales, dolphins and seabirds will be destroyed. Tourism and livelihoods effected, and all for profit for the government and Northland. This is not green energy. If the power is needed in England then it should be generated there.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 0025E79C

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

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

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

Consequently, the application does not satisfy the evidential standard outlined in the Habitats Regulations, which necessitates excluding adverse effects beyond reasonable scientific doubt. This situation necessitates the application of the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, including obligations concerning biodiversity protection and environmental integrity, as it has not been established that impacts have been fully assessed or that suitable safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data contribute to the unreliability and incompleteness of the Environmental Impact Assessment Report. These deficiencies hinder a lawful and robust evaluation of environmental effects, leaving the competent authority unable to make a well-informed determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposed development lacks a comprehensive assessment of alternatives, which falls short of the requirements set out by the Environmental Impact Assessment regime. Instead of offering a well-structured and reasoned comparison of realistic

alternatives based on their environmental impacts, the application merely recounts the project's evolution. This narrative fails to prove that the developer has adequately identified, assessed, and selected less harmful options over more damaging ones.

There is a notable absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. Specifically, the application does not demonstrate that consideration was given to positioning the turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. The West Lewis coastline's sensitivity and the critical importance of proximity to shore in assessing impacts highlight the seriousness of this omission, as it prevents any conclusion that the proposed siting is the least damaging option.

These shortcomings also extend to the evaluation of cable routing and landfall assessments, where there is inadequate evidence indicating that alternative routes have been thoroughly examined to minimise impacts on sensitive receptors. This includes culturally and spiritually significant locations such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests a failure to implement mitigation by design, instead relying on post-design measures to address potential harm.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This reflects a disregard for the established mitigation hierarchy, hindering the competent authority's ability to ascertain whether more suitable and less harmful alternatives are available. Without a robust assessment of alternatives, it cannot be concluded that the proposal is sustainable or aligns with policy requirements.

From a policy standpoint, this lack of thorough evaluation undermines adherence to National Planning Framework 4, especially concerning the protection of natural areas, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission, contributing to the overall conclusion that the application has not been properly evaluated and cannot be lawfully determined.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a biologically active marine system that is highly sensitive. However, the assessment of marine ecology and protected species is materially deficient, failing to provide a complete or reliable understanding of ecological receptors within this area. The baseline data remains incomplete, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of various species. This inadequacy results in a lack of a sound evidential basis for evaluating potential impacts.

A significant shortcoming in the assessment pertains to otters, which are classified as a European Protected Species. The application neglects to properly recognise and assess

their active use of coastal areas for foraging and movement. The core foraging range and behavioural patterns of otters have not been adequately considered, meaning that potential effects from construction disturbances, noise, and increased activity remain unassessed. Consequently, this oversight undermines any conclusions drawn regarding the absence of significant effects on this species.

Further issues arise in the assessment of basking sharks, where the reliance on aerial surveys introduces notable detection bias, particularly given the challenging Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that suggest frequent use of these waters. The failure to incorporate or properly consider such data results in an incomplete baseline and diminishes the reliability of the conclusions presented.

The methodological limitations evident in the assessment lead to conclusions of negligible or non-significant effects being based on assumptions rather than robust evidence. Furthermore, the lack of sufficient baseline data obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This creates uncertainty surrounding the true scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as the identification and assessment of protected species are inadequate. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus engaging the precautionary principle. Under these circumstances, granting consent cannot be justified in a lawful manner.

Overall, 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, culminating in the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application for the development is fundamentally flawed and cannot be relied upon. It presents significant gaps in evidence and contains internal inconsistencies that undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, which are already in decline. However, the application fails to sufficiently demonstrate that these species will not be adversely affected. This development is situated within key foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss have not been adequately evaluated.

The application contains a notable contradiction; while the developer concludes that there are no significant adverse effects, they also put forward a Habitats Regulations

derogation case. This is only necessary when significant harm is expected, which raises serious questions about the reliability of the assessment. Furthermore, there is inadequate evidence to support the claim that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not fully recognised, and reliance on modelling approaches introduces further uncertainty, particularly for species facing severe decline, like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially considering that baseline data is incomplete and behavioural responses remain inadequately understood.

The location of turbines within a recognised migratory corridor poses an additional and significant risk, 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 implications of sustained mortality within this corridor or consider the potential effects on species that have relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and modelling limitations, indicates that the required standard of beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle, thus precluding a lawful conclusion in support 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 demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

Overall, the assessment is unreliable due to these internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a robust evaluation of impacts and lead to the conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a living cultural landscape where environment, language, tradition, and community are deeply intertwined. However, the assessment of cultural heritage and community identity presented in this application is fundamentally inadequate. It adopts a reductive view, treating heritage merely as isolated and static features, neglecting their ongoing social, cultural, and spiritual functions within the community.

Significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are classified as static elements, despite being active places of burial and spiritual practice. This categorisation fails to account for their continued use and meaning, as well as the impact that development would have on their surroundings. Such mischaracterisation leads to an incomplete evaluation of cultural effects and disregards their vital role in

community life.

Moreover, the assessment entirely overlooks the intangible aspects of cultural heritage, including the Gaelic language and the traditions that shape the identity of the area. These critical elements are absent from the evaluation, representing a significant omission that hinders a proper understanding of the cultural impact of the proposed development.

There are also serious concerns about community rights and engagement. The Gaelic-speaking population, with its unique cultural identity recognised as an Indigenous People, has not been provided with a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and fails to uphold established principles of participation concerning cultural and environmental interests.

Compounding these issues is the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. Without this essential evaluation, the competent authority cannot fulfil its legal obligations to assess the social, cultural, and economic impacts on the island community, making the determination unlawful.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage and the failure to acknowledge living cultural practices represent a clear departure from necessary policy requirements.

Ultimately, the combination of these failures results in a significant evidential gap. The cultural impacts of the proposed development have not been adequately assessed, and the application lacks a sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises serious concerns regarding its social impacts, health, and wellbeing, with a distinct lack of transparency undermining any lawful evaluation. Although a Social Impact Assessment was commissioned by the developer, including focus groups with local residents, the full report has not been made available. This represents a critical evidential gap, leaving both the public and the competent authority unable to fully grasp the extent of the social risks highlighted through the developer's own investigations.

Evidence gathered suggests that local residents are already feeling stress, anxiety, and concern due to the proposal's scale and proximity. These impacts stem from direct engagement with the community and are therefore grounded in reality rather than speculation. The absence of the full assessment restricts thorough scrutiny of these findings and hinders the assessment of their significance in the decision-making

process.

Moreover, there are indications that the proposal is viewed as a threat to community identity and cohesion, with the developer's findings indicating potential "cultural loss." Yet, these impacts have not been sufficiently incorporated into the main application or afforded the weight they deserve. By withholding the complete Social Impact Assessment, the developer obscures the true human and social costs associated with the development.

This lack of transparency also compromises the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health implications is vital for developments of this magnitude, especially when community character and functionality could be influenced. The failure to provide the full dataset means that the application does not deliver a complete evidential basis needed to weigh benefits against harm adequately.

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

The procedural ramifications 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 represents a significant omission in the application, failing to meet the evidential requirements of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with the evidence of existing negative impacts, leads to an incomplete and unreliable assessment. This ultimately impedes a lawful determination and reinforces the assertion that the application lacks adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented regarding seascape, landscape, and visual impacts is significantly inadequate and fails to convey the true extent of change anticipated or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its unspoiled Atlantic horizon, its undeveloped nature, and a pronounced sense of remoteness. The proposed installation of large-scale turbines in close proximity to the shore would establish a persistent and overwhelming industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

The application does not sufficiently represent the extent of this visual transformation. The size and nearness of the turbines will dominate views from residential areas, historic sites, and popular coastal locations, leading to a direct impact on visual

amenity and diminishing the defining characteristics of naturalness and remoteness. The assessment inadequately communicates the significance of this impact within the context of such a sensitive landscape.

Methodological concerns arise from the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately capture the most sensitive receptors or the worst-case scenarios, particularly with respect to key cultural heritage sites and high-value landscapes. This suggests a possibility that the scale of the visual impact has been downplayed, which undermines the assessment's reliability.

Additionally, there is a failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are situated within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as isolated entities rather than acknowledging their interdependence, leading to an incomplete appraisal of the 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 link to the natural horizon. This represents not only a visual impact but also a more extensive cultural and spatial detriment that has not been thoroughly assessed within the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 regarding the safeguarding of natural areas and historical assets. The magnitude of change proposed is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case analysis further weakens any assertion of policy adherence.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their visibility would be overwhelming and unavoidable. Consequently, the change is fundamentally permanent and cannot be reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately reflect the extent of impact, the environment's sensitivity, and the interconnectedness of landscape and heritage. These shortcomings preclude a dependable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of pollution and construction risks related to the proposal is fundamentally lacking in detail, hindering any evaluation of potential environmental effects. Notably, the project entails extensive seabed preparation and installation works in a high-energy Atlantic environment. However, the absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans is

alarming. The application relies on undefined mitigation and contingency measures that are intended to be formulated post-consent, which severely limits the opportunity for a meaningful assessment of their adequacy or potential effectiveness.

This reliance on unspecified future measures is especially troubling due to the sensitive nature of the receiving environment. The West Lewis coastline is characterised by clean coastal waters and critical habitats that are susceptible to disturbances from sediment and contamination. While the application acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide adequate detail on strategies to prevent, control, or monitor these risks.

Moreover, there remains significant uncertainty regarding the scale and behaviour of sediment plumes that may result from the proposed seabed disturbance and cable installation. In the absence of comprehensive modelling and clearly outlined management strategies, the extent, duration, and ecological consequences of these impacts cannot be accurately assessed. This uncertainty extends to the potential effects on marine species and habitats identified as sensitive within the broader assessment framework.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application fails to allow for an evaluation of whether effective safeguards are in place to address potential pollution events. This not only introduces procedural risks but also undermines the ability of the competent authority to thoroughly assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Assessments of likely significant effects and their corresponding mitigation measures must occur prior to granting consent. The absence of this critical information undermines the legality of the determination process. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

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

A critical concern is the erroneous assumption that fishing activities can be displaced without negative consequences. The application lacks any evidence to support the availability of alternative fishing grounds that are both accessible and capable of handling additional pressure. This significant oversight raises the risk of overfishing in other areas, potentially leading to broader economic repercussions for the local fishing fleet. An absence of a clear, evidence-based assessment leaves the impacts on fisheries and local livelihoods poorly understood.

Moreover, the proposal poses considerable risks to marine species, particularly through the underwater noise generated during construction. The use of high-energy hammer piling over extended periods is expected to disturb marine life over large areas, including species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious alarms, yet the application diminishes the seriousness of these effects without adequate supporting evidence.

There exists a glaring inconsistency within the application, as it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously declaring such impacts to be negligible. This contradiction undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal approval.

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

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

In summary, the combination of insufficient evidence regarding fishing displacement, underestimation of acoustic impacts, and internal inconsistencies renders the assessment incomplete and unreliable. These shortcomings impede a thorough evaluation of the proposal's impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the onshore infrastructure is fundamentally lacking and does not take into account the full range of impacts from what constitutes a single integrated project. The offshore turbines are closely linked to the onshore works, yet they are assessed separately, leading to a disjointed approach that masks the true extent of environmental and socio-economic consequences.

The onshore components comprise cabling across protected moorland, the

construction of a substation near Stornoway, and related access infrastructure through sensitive landscapes. Excavation in areas of deep peat, especially within Barvas Moor, poses risks to a significant carbon store and ecologically sensitive habitat. The application falls short by failing to provide a detailed assessment of these impacts, which obstructs a full understanding of the project's overall environmental footprint.

By excluding or delaying the evaluation of onshore impacts, the application inhibits a proper assessment of cumulative effects. The Environmental Impact Assessment process requires that all aspects of a project be considered collectively. However, the disconnection between offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities remain unclear.

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

Concerns also arise regarding the carbon balance. Disturbance of peatland can release stored carbon, potentially creating a carbon debt that runs counter to renewable energy development goals. The application fails to address this issue sufficiently or prove that the overall carbon balance is advantageous.

Furthermore, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is no evidence that the necessary consents or processes have been started, leading to doubts about the feasibility and lawful execution of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is missing an evaluation of dark skies and nocturnal wildlife, which represents a significant oversight. The coastline of West Lewis features exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism. The proposal includes permanent red aviation lighting that would be visible over long distances, creating an intrusive “wall of light” effect across the western horizon, fundamentally changing the night-time environment.

The application fails to consider how this lighting will impact visual amenity, landscape

character, and the experiences of both residents and visitors. This is particularly important given the significance of dark skies to the area's identity and the growth of tourism sectors such as astro-tourism. As a result, there is a substantial gap in the overall landscape and environmental assessment.

More importantly, the proposal does not assess the effects of this lighting on nocturnal wildlife. Certain species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are sensitive to artificial light due to phototaxis, which can cause disorientation and raise collision risks. The absence of a lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species or the risk of increased mortality are not evaluated.

This issue is exacerbated by the reliance on daytime survey data for the ornithological assessment, which does not adequately reflect nocturnal activity and its associated risks. Species like Kittiwakes that may forage or migrate at night are also susceptible to disorientation from artificial lighting, yet this risk has not been assessed. Without site-specific night-time data, there is a crucial gap in understanding the ecological impacts.

Determining whether protected species or designated sites could be negatively affected is impossible without an assessment of nocturnal impacts. The application does not meet the evidential standard required to exclude adverse effects beyond reasonable scientific doubt, engaging the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4, which relates to the protection of natural places and environmental quality. It also weakens the comprehensive assessment of landscape and seascape impacts since the character of night-time environments is a critical component of the ecosystem.

In summary, the lack of an assessment regarding dark skies and nocturnal wildlife constitutes 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.

TOURISM

The assessment of tourism impacts within the application is critically inadequate, neglecting to analyse the economic and social ramifications for a vital sector of the Isle of Lewis economy. The area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are key to tourism, which is predominantly driven by these factors. Despite the application acknowledging that 86% of visitors are attracted by the scenery, it does not provide any quantified evaluation of how large-scale offshore infrastructure may influence visitor numbers, behaviours, or the overall economic contributions of tourism.

Tourism on the Isle of Lewis 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 local economy. However, the application falls short by not modelling the potential impact of seascape industrialisation and a decline in environmental quality on Tourism Gross Value Added or the broader economic resilience of the island. Without this analysis, it remains unclear whether the proposed development would yield a net economic benefit or jeopardise a significant and expanding sector.

Additionally, the assessment overlooks the critical role that environmental quality plays in supporting tourism. Unspoiled landscapes and dark skies are essential for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this gap, leaving a significant void in understanding the implications for this recognised and growing aspect of the local economy.

In a community such as this island, which has limited economic diversification, the neglect to evaluate tourism impacts carries broader consequences for local employment, businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been scrutinised as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate alignment with National Planning Framework 4, particularly concerning economic impact and the necessity to illustrate net benefit. It also contradicts strategic objectives that recognise tourism as a priority growth sector, lacking the necessary evidence for the competent authority to thoroughly assess the economic consequences of the proposal.

Overall, the failure to quantify tourism impacts, consider the environmental factors that drive visitor behaviour, and acknowledge the island's economic dependencies leads to a significant evidential shortcoming. This inadequacy obstructs a comprehensive evaluation of the economic effects and supports the view 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 defined by statutory duties, national policy, and evidential criteria. The application echoes the fundamental issues that resulted in the 2008 rejection of the Lewis Wind Power proposal, where the unacceptable scale of industrialisation was highlighted. This current proposal is put forth under a policy framework that supposedly emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still does not satisfy these requirements.

There are substantial shortcomings in the evidential basis for determining the application. Critical gaps exist in baseline data, with an undefined design envelope and unspecified mitigation measures. Furthermore, key impact pathways such as nocturnal wildlife, the full scope of onshore infrastructure, and effects on tourism have been omitted. Consequently, the Environmental Impact Assessment is incomplete, failing to

provide a clear understanding of potential significant effects and residual impacts.

Additionally, procedural issues are evident. The lack of a compliant Island Communities Impact Assessment breaches the statutory duties established under the Islands (Scotland) Act 2018. Furthermore, the failure to present a full Social Impact Assessment constitutes a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal contradicts National Planning Framework 4, as it does not adequately protect biodiversity, natural places, or cultural heritage. It also fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Moreover, the cumulative impact of offshore and onshore components has not been adequately assessed, obscuring the 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 exhibit inconsistencies. The evidential threshold required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the application of the precautionary principle, which prevents a lawful conclusion that impacts are acceptable.

Furthermore, the proposal would lead to substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption to cultural and visual connections, and negative implications for tourism are all permanent effects that cannot be mitigated to an acceptable level.

In summary, the application is both procedurally and substantively unfit for determination. The significant information deficiencies, paired with policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent based on these grounds or invokes the appropriate regulatory provisions to mandate the submission of the missing information.

Therefore, I formally request that the application for the Spiorad na Mara Offshore Wind Farm is refused in its entirety.

Additional Comments

If this project goes ahead it will destroy Lewis, we need to protect our environment, on land, sea and in the air. We need to protect our heritage, our way of life, our seas, our peat moorland, our wildlife on land, sea and in the air, we need to protect our people. It distresses me to see how little effort Northland have gone to to assess the damage to human health during building, running and decommissioning, they seem to think that to

expect 'adverse mental and physical health impacts on residents near to the offshore project' is acceptable. The impacts of infrasound will be felt by all living beings for a great distance from the turbines. Infrasound impact is not yet fully known but research is suggesting alarming side effects to living beings. To read that birds and sea life are changing their behaviour to their detriment because of infrasound is very concerning to me.

I believe that to be as environmentally friendly as possible, power should be created as near to where it is needed as it can. As the energy generated from this project is headed for England, I am appalled that Lewis and Scotland are to be ripped apart causing immense environmental damage (especially to peat) for the energy to be transported. Scotland is already overproducing wind energy, turbines are regularly switched off for billions of pounds of constraint payments to be made, thus increasing poverty as we the consumer have to pay. I find this very alarming and distressing.

On Lewis over the last 6 years our tourism industry has grown massively, we are a very different place from when our council, without consultation with the residents, told the civil servants that the Western Isles would welcome windfarms. I didn't feel consulted then.

I would feel very sad for myself, our residents and tourists if this project went ahead. Gone would be our dark skies and peaceful existence, our world famous Callanish Stones would lose their magic with a wall of gigantic noisy strobing turbines along the coastline.

Recently a similar, but with less turbines, windfarm off the coast of Ireland was withdrawn, The Sceirde Rocks Offshore Windfarm, as it was stated that it was not possible to ensure its survivability for technical, weather, environmental and engineering reasons. If it's not safe off Galway I fear it's not safe off Lewis either. I find the prospect of this offshore windfarm materialising depressing.

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: 8CDA78AA

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 marine licensing and Environmental Impact Assessment protocols. The objection is grounded in a thorough examination of the Environmental Impact Assessment Report and associated documentation, highlighting 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, a region noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the compatibility of the proposal with statutory requirements, national policies, and the fundamental principles of sustainable development.

The application is deficient in its evidential foundation, lacking critical environmental data and presenting limited, inconsistent baseline information. Numerous aspects of the proposal are inadequately defined. The flexible design framework employed leads to ambiguities about the likely significant effects, and the reliance on unspecified mitigation measures precludes any meaningful assessment of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive or informed understanding of the impacts on the environment, culture, or community. Assertions of negligible or non-significant effects lack robust supporting evidence.

Moreover, there are substantial conflicts with established policies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment framework, or National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not convincingly demonstrate compliance with national obligations aimed at preserving biodiversity, addressing climate concerns, and maintaining environmental integrity. These conflicts directly affect the statutory criteria for consent and compromise the ability of the competent authority to determine the acceptability of the development within policy contexts.

The unprecedented scale of this proposal raises further issues, as large turbines are to be positioned very close to the shoreline, leading to significant concerns about landscape capacity, visual impact, and environmental repercussions. Overall, the combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrates that the application is incomplete and fails to support a lawful determination. Under these circumstances, the precautionary principle must be invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species associated with the proposal is significantly lacking, failing to offer a thorough and dependable understanding of ecological receptors in the West Lewis coastal area. This marine system is both highly sensitive and biologically active, yet the existing baseline data remains incomplete, while the methodologies employed do not effectively capture essential aspects such as species presence, behaviour, and habitat utilisation. Consequently, the assessment does not furnish a sound evidential framework for assessing potential impacts.

One notable gap concerns otters, which are classified as a European Protected Species. The application does not adequately acknowledge or assess their active utilisation of coastal regions for foraging and movement. The oversight of their core foraging areas and behavioural patterns leads to an inadequate evaluation of the possible impacts stemming from construction activities, noise, and increased human activity. This deficiency undermines any assertions about the lack of significant effects on the otter population.

Moreover, the assessment of basking sharks exhibits further shortcomings, particularly due to reliance on aerial surveys that introduce considerable detection bias, especially under Atlantic weather conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that demonstrate frequent usage of these waters. The exclusion or insufficient consideration of such data results in an incomplete baseline and diminishes the trustworthiness of the conclusions drawn.

These methodological flaws indicate that the assertions of negligible or non-significant effects rest more on presumptions than on solid evidence. The lack of comprehensive baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including those related to seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment framework and National Planning Framework 4, as there has been inadequate identification and assessment of protected species. The uncertainty introduced by these shortcomings means that it is impossible to rule out adverse effects beyond a reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these issues, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, contributing to the overall determination that the application lacks a sufficient evidential basis.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interlinked. Instead of appreciating heritage as an evolving entity with ongoing social, cultural, and spiritual significance, the application adopts a simplistic view that treats it as a collection of isolated, static assets.

There is a critical shortcoming in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are approached. These sites are active areas for burial and spiritual observance, yet the assessment overlooks their current use, meaning, and the potential impacts of development on their environment. This misrepresentation leads to an incomplete understanding of cultural implications, neglecting their integral role in community life.

Moreover, the assessment fails to address intangible cultural heritage elements, including the Gaelic language and traditions, as well as the long-standing relationship the community has with the coastal environment. These components are essential to the area's identity but are conspicuously absent from the evaluation, resulting in a significant gap. Without acknowledging these factors, the true cultural impact of the development remains obscured.

Concerns also arise regarding community rights and participation. The Gaelic-speaking population embodies a unique cultural identity characteristic of Indigenous Peoples; however, there has been no process for Free, Prior and Informed Consent. This lack of meaningful engagement compromises the assessment's validity and disregards established principles of community involvement in matters affecting cultural and environmental interests.

Compounding these issues is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without such an assessment, the competent authority is unable to fulfil its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission is a significant barrier to lawful decision-making.

From a policy standpoint, these shortcomings conflict with National Planning Framework 4, particularly regarding the safeguarding of historic assets and locations. The neglect of both tangible and intangible heritage, along with the disregard for living cultural practices, clearly diverges from established policy requirements.

Ultimately, the absence of a thorough evaluation of living heritage, intangible cultural values, community rights, and statutory responsibilities leads to a substantial evidential void. The cultural ramifications of the proposed development have not been adequately assessed, and the application fails to deliver a solid foundation for understanding the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

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

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

In summary, the combination of undefined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts results in a

materially deficient assessment. These shortcomings obstruct a thorough evaluation of construction and pollution risks and reinforce the argument that the application is incomplete.

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 economic contribution of tourism to the Isle of Lewis has increased significantly, rising from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application fails to provide a thorough assessment of how large-scale offshore infrastructure could impact tourism, which relies heavily on the area's wild coastline, nearly pristine landscape, dark skies, and sense of remoteness. Despite acknowledging that 86% of visitors are attracted by the scenery, there is no quantified analysis of the potential effects on visitor numbers, behaviour, or overall economic contribution.

Furthermore, the assessment neglects the critical role of environmental quality in sustaining tourism, particularly regarding the significance of unspoiled landscapes and dark skies for visitor experiences. The omission of a Dark Skies Assessment exacerbates the inadequacy of this evaluation, resulting in a major gap in understanding the impacts on the growing sectors of nature-based tourism and astro-tourism.

In an island community with limited economic diversification, the lack of analysis on tourism impacts poses broader concerns for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been adequately evaluated as stipulated by the Islands (Scotland) Act 2018. Additionally, the application does not demonstrate compliance with the National Planning Framework 4, particularly concerning economic impact and the necessity to show net benefits. It contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide sufficient evidence for the competent authority to assess the economic consequences of the proposal.

Collectively, the inadequacies in quantifying tourism impacts, evaluating environmental influences on visitor behaviour, and recognising the economic dependency of the island create a significant evidential gap. This gap obstructs a comprehensive evaluation of economic effects, leading to the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements for sustainable development according to statutory duties, national policy, and evidential standards. It echoes the issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that

emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application lacks a comprehensive evidential basis for decision-making.

There are significant gaps in the baseline data, an undefined design envelope is used, unspecified mitigation measures are relied upon, and crucial impact pathways are omitted. These include considerations for nocturnal wildlife, complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate and fails to provide a thorough understanding of likely significant effects or residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands (Scotland) Act 2018. Furthermore, the failure to present a complete Social Impact Assessment represents a serious omission. Such deficiencies hinder the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal contradicts National Planning Framework 4, as it does not sufficiently demonstrate protection of biodiversity, natural places, and cultural heritage. It fails to indicate acceptable health and wellbeing impacts and cannot prove a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been adequately evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments relating to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, thereby invoking the precautionary principle and barring a lawful conclusion about the acceptability of impacts.

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

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

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

Additional Comments

My personal view is that there will be absolutely no positive aspects whatsoever to those proposed wind farms, and visually they will be heinous

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: CC67D9ED

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 thorough review of the Environmental Impact Assessment Report and the supporting documentation reveals significant deficiencies in material planning, environmental considerations, cultural impacts, and procedural aspects. The site is located off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. The design, proximity, and scale of the proposal raise serious concerns about its alignment with statutory requirements, national policy, and the tenets of sustainable development.

The application does not provide an adequate evidential basis for a lawful determination. There is a lack of critical environmental data, while baseline information is both limited and inconsistent. Moreover, key aspects of the proposal remain undefined. The flexible design framework complicates the assessment of likely significant effects, and reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects unsupported by robust evidence.

There are evident and serious policy conflicts present. The proposal does not appear to comply with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4. These conflicts are especially pertinent in relation to biodiversity, natural environments, cultural heritage, and health and wellbeing. The application fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent and impair the competent authority's capacity to determine the development's acceptability within policy frameworks.

The unprecedented scale of the proposal, with large turbines positioned in close proximity to the shoreline, gives rise to considerable concerns regarding landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of sufficient information, reliance on undefined mitigation measures, evidential inadequacies, and clear non-compliance with policy highlight that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, represents a major shortcoming in the assessment. These sites serve as active places for burial and spiritual practice; however, they have been categorised merely as static features. This oversight fails to acknowledge their ongoing use and significance, as well as the potential impact of development on their setting. Such a mischaracterisation leads to an inadequate evaluation of cultural effects and neglects their importance within community life.

Furthermore, the assessment overlooks intangible aspects of cultural heritage, including the Gaelic language, local traditions, and the community's enduring relationship with the coastal environment. These elements are vital to the area's identity and have been wholly disregarded, marking a significant omission. The lack of consideration for these factors means the cultural impact of the proposed development cannot be fully comprehended.

There are also serious concerns regarding community rights and engagement. The Gaelic-speaking population, which possesses distinct characteristics of an Indigenous People, has not been granted the opportunity for Free, Prior and Informed Consent. The absence of this meaningful engagement diminishes the credibility of the assessment and contradicts established principles of participation in decisions that affect cultural and environmental interests.

Additionally, a critical procedural gap exists due to the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission is significant enough to prevent a lawful determination.

From a policy standpoint, these inadequacies place the proposal in direct conflict with National Planning Framework 4, especially concerning the protection of historic assets and places. The failure to take into account both tangible and intangible heritage, and to recognise living cultural practices, represents a clear deviation from policy requirements.

Overall, the lack of assessment of living heritage, intangible cultural value, community rights, and adherence to statutory obligations results in a considerable evidential gap. The cultural impacts of the development have not been adequately assessed, and the application does not present a robust foundation for understanding the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts associated with the proposed development is significantly lacking, failing to capture the true extent of the changes anticipated and the sensitivity of the surrounding environment. The character of the West Lewis coastline is defined by its open view of the Atlantic and its undeveloped, remote nature. The proposed large-scale turbines would intrude upon this landscape, establishing an

industrial presence that would irrevocably alter its character and result in a permanent transformation.

Furthermore, the evaluation does not accurately depict the magnitude of the visual alterations that would occur. Given the scale and proximity of the turbines, they would dominate the views from residential areas, historic locations, and popular coastal spots. This dominance would have a detrimental effect on visual amenity and diminish the essential qualities of naturalness and remoteness that define this area. The assessment's failure to adequately address the significance of these impacts in such a sensitive landscape is concerning.

Methodological flaws have also been identified regarding the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints chosen may not fully represent the most sensitive receptors or the most severe scenarios, especially concerning critical cultural heritage sites and valued landscapes. This oversight raises the possibility that the true scale of the visual impact has been underestimated, calling into question the reliability of the assessment's findings.

Additionally, the assessment does not adequately consider the interconnectedness of landscape, seascape, and cultural heritage. Key sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape context, linked visually and spatially to the Atlantic horizon. Treating these assets as isolated entities neglects their interdependence, resulting in an incomplete evaluation of the impacts on their cultural significance and setting.

The industrialisation of the seascape would disrupt these connections, altering the context within which heritage sites are appreciated and breaking their link to the natural horizon. This represents not only a visual impact but also a cultural and spatial harm that the application has not sufficiently addressed.

From a policy standpoint, the proposal contradicts the guidelines outlined in the National Planning Framework 4, particularly regarding the protection of natural landscapes and heritage sites. The extent of the proposed changes conflicts with requirements to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further compromises the proposal's compliance with established policy.

It is evident that the impacts highlighted cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable, resulting in fundamental and permanent changes that cannot be reduced to an acceptable level through mitigation measures.

In summary, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a trustworthy evaluation and reinforce the conclusion that the proposal is incompatible with the need to protect this landscape.

FISHERIES AND MARINE LIFE

The evaluation of fisheries and marine life in the application is inadequate, failing to present a solid analysis of ecological and socio-economic effects. The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry. However, the application does not prove that these habitats and uses can be preserved without causing significant disruption.

A major concern is the claim that fishing activities can be shifted without repercussions. The application lacks proof that alternative fishing areas exist, are accessible, or can handle increased fishing pressure. This gap is critical, as displacement could lead to overfishing in other locations, with potential negative effects on the local fishing fleet's economy. Without a detailed and evidence-based analysis, it is impossible to fully grasp the implications for fisheries and community livelihoods.

The proposal also poses serious risks to marine species due to underwater noise from construction activities. The use of high-energy hammer piling for extended periods is expected to create disturbances that could affect marine life over large areas, specifically impacting dolphin populations. The anticipated disturbance to a significant segment of the local bottlenose dolphin population raises urgent concerns, yet the application diminishes the importance of these impacts without adequate evidence.

There is a notable inconsistency in the application, where the requirement for licences to authorise harm to European Protected Species is acknowledged, while impacts are simultaneously described as negligible. This contradiction undermines the assessment's credibility and raises issues related to compliance with the Habitats Regulations, especially where anticipated harm necessitates legal approval.

The analysis also overlooks the cumulative effects of various pressures, such as habitat disruption, noise pollution, and the displacement of fishing activities. A thorough examination of these combined impacts is necessary to determine the overall effects 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 prove that the proposed development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, which hinders any assertion that the project constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed development includes significant onshore infrastructure elements such as the construction of a substation near Stornoway, cabling across protected moorland, and access routes through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and ecologically sensitive habitat. However, the application fails to provide a comprehensive assessment of these impacts, leaving a critical gap in understanding the overall environmental footprint of the project.

A significant concern arises from the fragmented assessment approach, which treats offshore turbines and onshore works separately despite their intrinsic link. This separation obscures the cumulative effects on peatlands, habitats, and local communities, which must be evaluated collectively as stipulated by the Environmental Impact Assessment process. The exclusion of onshore impacts undermines the ability to fully comprehend the project's overall implications.

Furthermore, there are serious risks to sensitive habitats, such as machair systems and peatland environments, which are subject to policy protection. The application does not demonstrate a thorough assessment of potential impacts on these habitats or indicate that adequate avoidance measures have been considered, creating a notable evidential gap concerning biodiversity protection.

The proposal also raises critical questions about carbon balance, as the disturbance of peatland releases stored carbon, potentially creating a carbon debt contrary to renewable energy objectives. The application inadequately addresses this issue, failing to prove that the overall carbon balance remains advantageous.

Additionally, routing the infrastructure through active croft land poses conflicts with existing land uses and legal rights. There is no evidence that necessary consents or processes have been initiated, raising significant concerns about the feasibility and legality of the project.

Overall, the failure to assess the project comprehensively, combined with the lack of evidence concerning environmental impacts and land use considerations, directly conflicts with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further casts doubt on the application, rendering it incomplete and unreliable, and preventing a lawful determination.

TOURISM

The assessment of tourism impacts associated with the proposed development is fundamentally inadequate, particularly regarding its implications for a critical component of the Isle of Lewis economy. Tourism relies heavily on the area's natural attributes, including its wild coastline, near-pristine landscapes, dark skies, and the overall sense of remoteness. The application acknowledges that a substantial 86% of visitors are attracted by the scenic beauty; however, it fails to provide a quantified analysis of how the introduction of large-scale offshore infrastructure may influence

visitor numbers, behaviour, or the overall economic contribution of this sector.

Tourism on the Isle of Lewis has seen considerable growth, with revenues increasing from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for approximately 16% of the island's economy. Despite this positive trend, the application neglects to model the potential impact of the industrialisation of the seascape and the consequent degradation of environmental quality on Tourism Gross Value Added and broader economic resilience. Without a thorough analysis, it remains unclear whether the proposed development would yield a net economic benefit or harm an already established and expanding sector.

Additionally, the assessment overlooks the vital role of environmental quality in sustaining tourism, particularly 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 exacerbates this oversight, creating a notable gap in understanding the potential impacts on this recognised and growing segment of the local economy. In a context where the island community faces limited economic diversification, this failure to evaluate tourism impacts has far-reaching consequences for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been adequately addressed, contrary to the requirements set forth under the Islands (Scotland) Act 2018.

From a policy perspective, the application does not sufficiently demonstrate compliance with National Planning Framework 4, especially concerning economic impact and the necessity to illustrate a net benefit. It also contradicts strategic objectives that designate tourism as a priority growth sector and fails to provide the necessary evidence for the competent authority to evaluate the economic repercussions of the proposal.

Overall, the shortcomings in quantifying tourism impacts, assessing the environmental factors that influence visitor behaviour, and considering the island's economic dependencies culminate in a significant evidential gap. This deficiency obstructs a thorough evaluation of the economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The 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.

Additional Comments

This idiotic wind farm should not be allowed to go ahead.
It will blight the pristine seascape of these islands- my home. Who wants to sit and look

out to sea which is calming and look at a disgusting steel man made blight? It's not even as if they are efficient (I work in the wind turbine industry) they are also not going to benefit these islands beyond a handful of short term jobs.

Whoever the clown in charge of this idea is should be locked up in a straight jacket and never see daylight again.

Yours faithfully,

[Redacted]

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